DRAFT
ENVIRONMENTAL ASSESSMENT

Proposed Construction and Operation of an Outpatient Clinic in Beaufort County, South Carolina

U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

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Executive Summary

This environmental assessment (EA) has been prepared to analyze the potential environmental impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort County, South Carolina. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code § 4321 et seq.).

Purpose and Need

The purpose of the Proposed Action is to provide outpatient health care services to area Veterans.

The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning (SCIP) process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

Proposed Action and Alternatives

VA's Proposed Action is to award a lease to a private entity that would construct an OPC for VA to lease and operate for up to 20 years in Beaufort County, SC. VA is considering offers received from three private entities, each of which provided a conceptual plan to construct an OPC at one of the three potential sites. This EA identifies each potential site and its corresponding conceptual plan as Alternative 1, 2, and 3. VA would select only one of the three Alternatives as the Proposed Action. This EA examines Alternatives 1, 2, and 3, and the No Action alternative in depth. These alternatives are described below.

Action Alternatives

Under either Alternative 1, 2, or 3, the private entity would be responsible for designing and constructing the OPC in compliance with VA design requirements and applicable federal, state, and local regulations. The private entity would also be required to design and construct the OPC to meet Green Building Initiative Green Globes certification (GBI 2025). The OPC would be operated and staffed by the Charleston VA Health Care System, with approximately 100 new staff members anticipated.

Details unique to Alternatives 1, 2, and 3 are described in the following sections:

Alternative 1: The site is located at 708 Robert Smalls Parkway, Town of Port Royal, Beaufort County, SC. The site is approximately 27 acres and is undeveloped, wooded land comprised of two adjacent parcels (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000). The site is surrounded by residential development. The Alternative 1 conceptual development plan shows that approximately 15.6 acres in the western portion of the site would be developed for the OPC and supporting infrastructure, with the remainder of the site remaining undeveloped.

Alternative 2: The site is located at Robert Smalls Parkway and Goethe Hill Road, north of the intersection with Goethe Hill Road, in the City of Beaufort, Beaufort County, SC. The site is approximately 16 acres and is undeveloped, wooded land on one parcel (Parcel ID: R120-028-000-0138-0000). The site is surrounded by residential development. The Alternative 2 conceptual development plan shows that approximately 13 acres of the site would be developed for the OPC and supporting infrastructure, with the remainder of the wooded area on the northeastern portion of the site remaining undeveloped.

Alternative 3: The site is located at 1844 Ribaut Road, Town of Port Royal, Beaufort County, SC. The site is approximately 11 acres and consists of three abutting parcels (Parcel IDs: R110-008-000-0114-0000, R110-008-000-0115-0000, R110-008-000-0118-0000). The western portion of the site is developed with three commercial buildings, and the eastern portion is developed with the former Sea Islands residential apartment complex with 10 residential apartment buildings no longer in use. A right-of-way (Parcel ID: R110 008 000 0701 0000) identified as Rahn Lane separates the commercial and residential developments at the site. The site is surrounded by residential and commercial development. The Alternative 3 conceptual development plan shows that the entire site would be redeveloped for the OPC and supporting infrastructure.

VA has not identified any other reasonable action alternatives that would meet the purpose and need for the Proposed Action.

No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. VA would continue to provide primary, mental health, and specialty care outpatient services at the existing clinic located in the Beaufort Naval Hospital in Beaufort, SC. The clinic would continue to have space gaps and operational inefficiencies, thus limiting VA's ability to provide modern, state-of-the-art health care services to Veterans in the region. The No Action alternative would not meet the purpose of or need for the Proposed Action. The proposed sites for the Beaufort OPC could remain vacant or be developed by others for other uses, in accordance with local zoning.

VA evaluated the No Action alternative in this EA. The No Action alternative provides a benchmark against which VA can compare the impacts of implementing the Proposed Action.

Summary of Potential Environmental Consequences

Table ES-1 lists the environmental resources evaluated and summarizes the potential impacts to each resource from the Proposed Action and the No Action alternative. As shown in Table ES-1, the Proposed Action under Alternatives 1, 2, or 3 would result in no significant adverse impact on any of the environmental resources analyzed in this EA.

Table ES - 1. Summary of Potential Environmental Consequences

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Aesthetics	**Construction:** Conversion from wooded area to active construction site for approximately 18-24 months. Temporary, minor adverse impact due to presence of construction equipment and site clearing. **Operation:** Permanent, minor adverse impact from conversion of wooded area to an active medical facility with a professionally maintained landscape.	**Construction:** Conversion from wooded area to active construction site for approximately 18-24 months. Temporary, minor adverse impact due to presence of construction equipment and site clearing. **Operation:** Permanent, minor adverse impact from conversion of wooded area to an active medical facility with a professionally maintained landscape.	**Construction:** The existing commercial warehouse and apartment complex would be demolished. Active construction site for approximately 18-24 months. Temporary, negligible adverse impact on aesthetics. **Operation:** Permanent, minor beneficial impact from conversion of developed area to an active medical facility with a professionally maintained landscape.	No impact
Air Quality	**Construction:** Emissions of fugitive dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation:** Emissions from heating, ventilation, and air conditioning (HVAC), emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	**Construction:** Emissions of fugitive dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation:** Emissions from heating, ventilation, and air conditioning (HVAC), emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	**Construction:** Emissions of fugitive dust from grading, criteria pollutant and greenhouse gas emissions from construction equipment and vehicles. Temporary, negligible adverse impact on air quality. **Operation:** Emissions from heating, ventilation, and air conditioning (HVAC), emergency generator testing, and vehicles, resulting in permanent, negligible adverse impact on air quality. OPC would be designed and operated to achieve Green Building Initiative Green Globes certification.	No impact
Wildlife and Habitat	**Construction:** Construction would clear potential habitat for federally and state listed species. Private entity would implement a time-of-year-restriction on tree clearing and conduct pre-construction clearance surveys for protected bat species and Migratory Bird Treaty Act birds if construction cannot be avoided during nesting season. Potential habitat for listed plant species was observed in the wetland areas. Should the private entity design and construct the final OPC to avoid impacts to wetlands, then potential impacts to listed plant species would be avoided. However, if the final design does not avoid wetland impacts, then the private entity would conduct a pre-construction survey for listed plant species during optimal plant survey windows to determine the species' presence or absence within the site. If a federally listed species is found within the site or is indicated within a one-mile radius of the site, the private entity should contact USFWS for further guidance. These impact avoidance measures would result in permanent, less-than-significant adverse impacts on wildlife and habitat. **Operation:** No additional impact beyond site development; permanent, negligible adverse impact on wildlife and habitat.	**Construction:** Construction would clear potential habitat for federally and state listed species. Private entity would implement a time-of-year-restriction on tree clearing and conduct pre-construction clearance surveys for protected bat species and Migratory Bird Treaty Act birds if construction cannot be avoided during nesting season. Potential habitat for listed plant species was observed in the wetland areas. Should the private entity design and construct the final OPC to avoid impacts to wetlands, then potential impacts to listed plant species would be avoided. However, if the final design does not avoid wetland impacts, then the private entity would conduct a pre-construction survey for listed plant species during optimal plant survey windows to determine the species' presence or absence within the site. If a federally listed species is found within the site or is indicated within a one-mile radius of the site, the private entity should contact USFWS for further guidance. These impact avoidance measures would result in permanent, less-than-significant adverse impacts on wildlife and habitat. **Operation:** No additional impact beyond site development; permanent, negligible adverse impact on wildlife and habitat.	**Construction:** Site is currently developed. No suitable habitat is present for federal or state listed species. For sparse large trees, private entity to obtain Town of Port Royal tree removal permit. **Operation:** No additional impact beyond site development. No impact on wildlife or habitat.	No impact

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Floodplains, Wetlands, and Coastal Zone	**Floodplains:** The site is primarily in Zone X, the 500-year floodplain. However, the conceptual plan positions most of the OPC development outside of the 500-year floodplain, thereby minimizing potential for flood damage. Construction and operation would result in a permanent, negligible impact on floodplains. **Wetlands:** Two wetlands and one stream were identified on site. The conceptual OPC development plan shows the stormwater detention pond overlapping part of the W-2 wetland in the northwest. Should the private entity design and construct the final OPC to avoid filling wetlands, then impacts to wetlands would be avoided. However, if impacts to wetlands cannot be avoided and filling less than 0.5 acres of the W-2 wetland is necessary, the private entity must obtain a Clean Water Act (CWA) Section 404 Nationwide Permit 39: Commercial and Institutional Developments from the U.S. Army Corps of Engineers (USACE). If filling more than 0.5 acres of wetland, a CWA Section 404 Individual Permit (IP) would be required. A CWA Section 401 Water Quality Certification review by SC Department of Environmental Services (SCDES) would occur as part of the joint federal/state review of Section 404 IP application. Private entity to implement required compensatory mitigation. Construction and operation would result in a permanent, minor adverse impact to wetlands. **Coastal Zone:** Construction and operation consistent with SC enforceable coastal zone policies, except Chapter III, Section IV – Policy 1.b, which aims to protect wetland resources. Permanent, minor impact on coastal zone resources. However, if the final design and construction of the OPC avoids wetland impacts, then Alternative 1 would be consistent with all coastal zone policies and have no impact on coastal zone resources.	**Floodplains:** The site is primarily outside of a flood hazard area, but the eastern portion of the site is in Zone X, the 500-year floodplain. Should the final design for the OPC require development within the 500-year floodplain, the private entity would comply with the City of Beaufort floodplain ordinance. Construction and operation would have a permanent, negligible adverse impact on floodplains. **Wetlands:** Two wetlands were identified on site. The conceptual OPC development plan shows one isolated wetland in the central portion of the site would be filled, while portions of the eastern wetland would be filled. Should the private entity design and construct the final OPC to avoid filling wetlands, then impacts to wetlands would be avoided. However, if impacts to wetlands cannot be avoided and filling less than 0.5 acres of wetland is necessary, the private entity must obtain a CWA Section 404 Nationwide Permit 39: Commercial and Institutional Developments from USACE. If filling more than 0.5 acres of wetland, a CWA Section 404 Individual Permit would be required. A CWA Section 401 Water Quality Certification review by SCDES would occur as part of the joint federal/state review of Section 404 IP application. Private entity to implement required compensatory mitigation. Construction and operation would result in a permanent, minor adverse impact to wetlands. **Coastal Zone:** Construction and operation consistent with SC enforceable coastal zone policies, except Chapter III, Section IV – Policy 1.b, which aims to protect wetland resources. Permanent, minor impact on coastal zone resources. However, if the final design and construction of the OPC avoids wetland impacts, then Alternative 2 would be consistent with all coastal zone policies and have no impact on coastal zone resources.	**Floodplains:** The site is outside 100- and 500-year floodplains. No impact on floodplains. **Wetlands:** Site contains no wetlands. No impact on wetlands. **Coastal Zone:** Construction and operation consistent with SC enforceable coastal zone policies. No impact on coastal zone resources.	No impact
Cultural and Historic Resources	**Construction and Operation:** Based on an Initial Cultural Resources Impact Prediction report and a Phase I archaeology investigation completed at each site, VA determined the Proposed Action would have no adverse effects to historic properties pursuant to 36 CFR 800.5(b). Closure of the existing VA clinic in the Naval Hospital Beaufort would have no impact on operations of the hospital. On May 5 and 6, 2025, VA initiated Section 106 consultation with the SC State Historic Preservation Office (SHPO); Beaufort County Historic Preservation Review Board (the Certified Local Government); Beaufort County Historical Society; and the five federally recognized Tribes with interests in Beaufort County, SC: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and Tuscarora Nation. VA will update the Final EA with the outcome of Section 106 consultation with the SC SHPO and other consulting parties.	**Construction and Operation:** Based on an Initial Cultural Resources Impact Prediction report and a Phase I archaeology investigation completed at each site, VA determined the Proposed Action would have no adverse effects to historic properties pursuant to 36 CFR 800.5(b). Closure of the existing VA clinic in the Naval Hospital Beaufort would have no impact on operations of the hospital. On May 5 and 6, 2025, VA initiated Section 106 consultation with the SC State Historic Preservation Office (SHPO); Beaufort County Historic Preservation Review Board (the Certified Local Government); Beaufort County Historical Society; and the five federally recognized Tribes with interests in Beaufort County, SC: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and Tuscarora Nation. VA will update the Final EA with the outcome of Section 106 consultation with the SC SHPO and other consulting parties.	**Construction and Operation:** Based on an Initial Cultural Resources Impact Prediction report and a Phase I archaeology investigation completed at each site, VA determined the Proposed Action would have no adverse effects to historic properties pursuant to 36 CFR 800.5(b). Closure of the existing VA clinic in the Naval Hospital Beaufort would have no impact on operations of the hospital. On May 5 and 6, 2025, VA initiated Section 106 consultation with the SC State Historic Preservation Office (SHPO); Beaufort County Historic Preservation Review Board (the Certified Local Government); Beaufort County Historical Society; and the five federally recognized Tribes with interests in Beaufort County, SC: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and Tuscarora Nation. VA will update the Final EA with the outcome of Section 106 consultation with the SC SHPO and other consulting parties.	No impact

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Geology and Soils	**Geology:** Building foundation not anticipated to encounter bedrock. No impact on geological resources during construction or operation. **Soil:** Prior to construction, private entity would apply for coverage under the SCDES National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities. Soil erosion and sedimentation minimized by implementing permit-required best management practices (BMPs), including those specified in SCDES *Water Regulations and Standards: Erosion and Sediment Reduction and Stormwater Management*. Construction would result in permanent, minor adverse impact on soil quality and prime farmland soil. No impact on off-site prime farmland. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact.	**Geology:** Building foundation not anticipated to encounter bedrock. No impact on geological resources during construction or operation. **Soil:** Prior to construction, private entity would apply for coverage under the SCDES National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities. Soil erosion and sedimentation minimized by implementing permit-required best management practices (BMPs), including those specified in SCDES *Water Regulations and Standards: Erosion and Sediment Reduction and Stormwater Management*. Construction would result in permanent, minor adverse impact on soil quality and prime farmland soil. No impact on off-site prime farmland. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact.	**Geology:** Building foundation not anticipated to encounter bedrock. No impact on geological resources during construction or operation. **Soil:** Prior to construction, private entity would apply for coverage under the SCDES National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities. Soil erosion and sedimentation minimized by implementing permit-required best management practices (BMPs), including those specified in SCDES *Water Regulations and Standards: Erosion and Sediment Reduction and Stormwater Management*. Construction would result in permanent, minor adverse impact on soil quality and prime farmland soil. No impact on off-site prime farmland. No mechanisms to further impact soil or cause erosion during operation of the OPC. No impact.	No impact
Hydrology and Water Quality	**Construction:** Permanent, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through SCDES NPDES General Permit for Stormwater Discharges from Construction Activities and implementing and maintaining permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan. **Operation:** Permanent, negligible adverse impact on hydrology and water quality from increased impervious surface; operational stormwater managed in new on-site stormwater detention basins.	**Construction:** Permanent, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through SCDES NPDES General Permit for Stormwater Discharges from Construction Activities and implementing and maintaining permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan. **Operation:** Permanent, negligible adverse impact on hydrology and water quality from increased impervious surface; operational stormwater managed in new on-site stormwater detention basins.	**Construction:** Permanent, negligible adverse impact on hydrology and water quality by regrading site drainage patterns; construction stormwater managed through SCDES NPDES General Permit for Stormwater Discharges from Construction Activities and implementing and maintaining permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan. **Operation:** Permanent, negligible adverse impact on hydrology and water quality from increased impervious surface; operational stormwater managed in new on-site stormwater detention basins.	No impact
Land Use	**Construction and Operation:** Development consistent with Town of Port Royal zoning regulations and the Port Royal 2030 Comprehensive Plan; Construction and operation would have no impact on land use.	**Construction and Operation:** Development consistent with City of Beaufort zoning regulations and the Beaufort County 2040 Comprehensive Plan; Construction and operation would have no impact on land use.	**Construction and Operation:** Development consistent with Town of Port Royal zoning regulations and the Port Royal 2030 Comprehensive Plan; Construction and operation would have no impact on land use.	No impact
Noise and Vibration	**Construction:** Construction noise maintained in compliance with Town of Port Royal noise ordinance and the U.S. Occupational Safety and Health Administration (OSHA) worker hearing conservation program, resulting in temporary, negligible adverse impacts on noise-sensitive receptors in the surrounding community. Temporary, negligible adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design. **Operation:** Noise generated from HVAC systems, monthly emergency generator testing, and vehicles traveling to and from the site during operation, resulting in a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community. No impact on vibration-sensitive receptors.	**Construction:** Construction noise maintained in compliance with City of Beaufort noise ordinance and the OSHA worker conservation program, resulting in temporary, negligible adverse impacts on noise-sensitive receptors in the surrounding community. Temporary, negligible adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design. **Operation:** Noise generated from HVAC systems, monthly emergency generator testing, and vehicles traveling to and from the site during operation, resulting in a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding area. No impact on vibration-sensitive receptors.	**Construction:** Construction noise maintained in compliance with Town of Port Royal noise ordinance and the OSHA worker hearing conservation program, resulting in temporary, minor adverse impacts on noise-sensitive receptors in the surrounding community. Temporary, minor adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design. **Operation:** Noise generated from HVAC systems, monthly emergency generator testing, and vehicles traveling to and from the site during operation, resulting in a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community. No impact on vibration-sensitive receptors.	No impact

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Solid Waste and Hazardous Materials	**Construction:** The Phase I Environmental Site Assessment (ESA) did not identify any recognized environmental conditions at the site. Construction debris recycled or reused to extent practicable, otherwise transported to an appropriate off-site landfill; additional volume of waste would have a temporary, minor adverse impact on landfill capacity.	**Operation:** Routine wastes managed per federal and state regulations. Solid wastes generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of wastes generated and disposed.	**Construction:** The Phase I ESA did not identify any recognized environmental conditions at the site; however, asbestos-containing materials (ACMs) and lead-based paints (LBPs) are likely present on the buildings. Prior to demolition of the buildings, the private entity would be responsible for assessing the buildings for ACM and LBP and proper management and disposal of ACM and LBP wastes. **Operation:** Routine wastes managed per federal and state regulations. Solid wastes generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Permanent, negligible adverse impact due to minimal volumes of wastes generated and disposed.	No impact
Traffic, Transportation, and Parking	**Construction:** Prior to constructing entrances along public roads, the private entity would be required to apply for and obtain a South Carolina Department of Transportation (SCDOT) Encroachment Permit to perform work within SCDOT-maintained rights-of-way. Additionally, Encroachment Permits would be obtained from the Town of Port Royal (for Alternatives 1 and 3) and the City of Beaufort (for Alternative 2) for work on roadways in those municipalities. Construction material deliveries, facility entrance construction, workers commuting to and from the site, and removal of equipment once construction is complete would have a temporary, negligible impact on traffic. **Operation:** During operation, vehicle traffic would increase, but the level of service is projected to remain at satisfactory level or above for up to the next 20 years, resulting in permanent, negligible impact on traffic conditions.	**Construction:** Prior to constructing entrances along public roads, the private entity would be required to apply for and obtain a South Carolina Department of Transportation (SCDOT) Encroachment Permit to perform work within SCDOT-maintained rights-of-way. Additionally, Encroachment Permits would be obtained from the Town of Port Royal (for Alternatives 1 and 3) and the City of Beaufort (for Alternative 2) for work on roadways in those municipalities. Construction material deliveries, facility entrance construction, workers commuting to and from the site, and removal of equipment once construction is complete would have a temporary, negligible impact on traffic. **Operation:** During operation, vehicle traffic would increase, but the level of service is projected to remain at satisfactory level or above for up to the next 20 years, resulting in permanent, negligible impact on traffic conditions.	**Construction:** Prior to constructing entrances along public roads, the private entity would be required to apply for and obtain a South Carolina Department of Transportation (SCDOT) Encroachment Permit to perform work within SCDOT-maintained rights-of-way. Additionally, Encroachment Permits would be obtained from the Town of Port Royal (for Alternatives 1 and 3) and the City of Beaufort (for Alternative 2) for work on roadways in those municipalities. Construction material deliveries, facility entrance construction, workers commuting to and from the site, and removal of equipment once construction is complete would have a temporary, negligible impact on traffic. **Operation:** During operation, vehicle traffic would increase, but the level of service is projected to remain at satisfactory level or above for up to the next 20 years, resulting in permanent, negligible impact on traffic conditions.	No impact
Utilities	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	**Construction:** Utilities services are available; extensions of utility lines to the site are required and responsibility of the private entity. Private entity to obtain permits required to connect to and utilize utility services. Private entity would be required to confirm with utility providers that capacities are available to meet the projected demands for the OPC. This would result in a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way. **Operation:** Operational utility use is not anticipated to impact service quality to existing customers. Private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewer utilities, lessening the demand for utilities. The increased use would result in a permanent, negligible adverse impact on utilities.	No impact

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Community Services	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System. Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System. Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	**Construction and Operation:** OPC resolves service gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System. Permanent, beneficial impact on community services related to health care for Veterans. No impact on other local community services.	No impact
Socioeconomics	**Construction:** Potential spending at local vendors and employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation**: Increase in staff and incidental spending by workers. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	**Construction:** Potential spending at local vendors and employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation**: Increase in staff and incidental spending by workers. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	**Construction:** Potential spending at local vendors and employment of construction workers. Temporary, negligible beneficial impact on socioeconomics. **Operation**: Increase in staff and incidental spending by workers. Permanent, negligible beneficial impact on socioeconomics. No impact at regional or state level.	No impact
Potential for Generating Substantial Controversy	**Construction**: No controversy anticipated during the construction. **Operation**: Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	**Construction**: No controversy anticipated during the construction. **Operation**: Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	**Construction**: No controversy anticipated during the construction. **Operation**: Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.	Controversy anticipated because existing VA clinics would remain overburdened.

Agency Coordination and Public Involvement

VA electronically sent a scoping notice to selected federal, state, and local agencies; Native American tribes; and elected officials to solicit input regarding the scope of the EA and environmental issues for in-depth analysis. The scoping notice was also published on VA's website at https://www.cfm.va.gov/environmental/ and in *The Island Packet* and *The Beaufort Gazette* on December 20 and 22, 2024, to announce VA's intent to prepare an EA and request scoping input. Copies of correspondence and newspaper notices are provided in Appendix E.

This Draft EA is published for a 30-day public review and comment period. VA electronically sent a notice of availability (NOA) to federal, state, and local agencies, Tribes, and community stakeholders, to solicit input on the Draft EA. The NOA for the Draft EA was also published in *The Island Packet* and *The Beaufort Gazette*. The NOA explained how to obtain the draft EA electronically from the VA website at https://www.cfm.va.gov/environmental/ and in print at the Beaufort Branch Library, located at 311 Scott Street, Beaufort, SC, 29902. The NOA explained that comments on the Draft EA are to be sent to vacoenvironment@va.gov. VA will summarize and address substantive comments in the Final EA.

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Appendices

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACAM	Air Conformity Applicability Model
ACM	Asbestos-containing material
APE	Area of Potential Effects
BCC	Birds of Conservation Concern
BER	Business Environmental Risk
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
CFR	Code of Federal Regulations
REC	Recognized Environmental Conditions
SDG	Significant Data Gaps
HREC	Historical Recognized Environmental Conditions
CREC	Controlled Recognized Environmental Conditions
CLV	Critical Lane Volume
CO	carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalents
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dBA	A-weighted decibels
EA	Environmental Assessment
EO	Executive Order
ESA	Endangered Species Act
FEMA	U.S. Federal Emergency Management Agency
FIRMette	Flood Insurance Rate Map
GCR	USEPA General Conformity Rule
GHG	greenhouse gas
HVAC	heating, ventilation, and air conditioning
ICRIP	Initial Cultural Resource Impact Prediction
IP	Individual Permit
IPaC	Information for Planning and Consultation
LBP	Lead-based paint
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHD	Natural Heritage Database
NHPA	National Historic Preservation Act

Acronym/Abbreviation	Definition
NO_2	Nitrogen dioxide
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resource Conservation Service
OPC	outpatient clinic
OSHA	U.S. Occupational Safety and Health Administration
PFO	palustrine forested wetland
Phase I ESA	ASTM Phase I Environmental Site Assessment
PSD	Prevention of Significant Deterioration
PM	particulate matter
SC	South Carolina
SCCMP	South Carolina Coastal Management Program
SCDES	SC Department of Environmental Services
SCDNR	South Carolina Department of Natural Resources
SCDOT	South Carolina Department of Transportation
SCIP	Strategic Capital Investment Planning
SCNHP	South Carolina Natural Heritage Program
SDG	Significant Data Gaps
SHPO	State Historic Preservation Office
SO_2	Sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasure
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
VdB	vibration decibels
VOC	volatile organic compounds
WQC	Water Quality Certification
WOTUS	Waters of the U.S.

1.0 INTRODUCTION

The U.S. Department of Veterans Affairs (VA) prepared this environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code § 4321 et seq.). NEPA requires federal agencies to consider the environmental effects of their proposed actions.

This EA supports the decision-making process for VA's Proposed Action to award a lease to a private entity that would construct an outpatient clinic (OPC) for VA to lease and operate in Beaufort County, South Carolina (SC). VA is considering offers received from three private entities, each of which has provided a conceptual plan to construct an OPC at one of the three potential sites. This EA identifies each potential site and its corresponding conceptual plan as Alternative 1, 2, and 3. VA would select only one of the three Alternatives for the OPC. The Alternative 1, 2, and 3 site locations are listed below and shown in maps provided in Figures 1, 2, and 3.

- **Alternative 1**: 708 Robert Smalls Parkway, Town of Port Royal, Beaufort County, SC (Figure 1)
- **Alternative 2**: Robert Smalls Parkway and Goethe Hill Road, City of Beaufort, Beaufort County, SC (Figure 2)
- **Alternative 3**: 1844 Ribaut Road, Town of Port Royal, Beaufort County, SC (Figure 3)

This EA presents an analysis of the potential impacts on the human environment from the construction and operation of the Proposed Action, as well as the impacts of a No Action alternative. As required under NEPA, this EA considers input from the public, agencies, and Tribes into the federal decision-making process; provides the federal decision-maker with an understanding of potential environmental effects of the decision before making it; identifies measures to reduce potential environmental effects; and documents the NEPA process. At the conclusion of the NEPA process, VA will determine whether this EA supports a Finding of No Significant Impact or if an Environmental Impact Statement is required.

Figure 1. Alternative 1 – 708 Robert Smalls Parkway Site Location Map

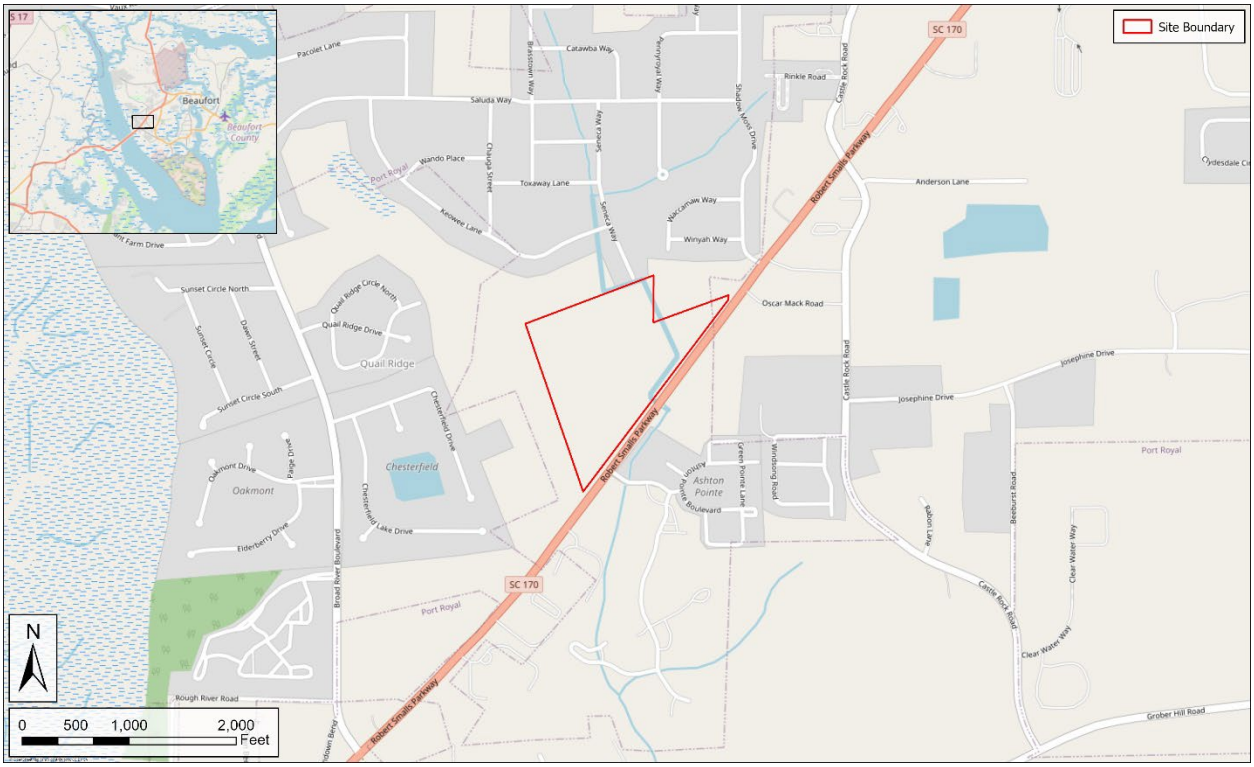


Figure 2. Alternative 2 – Robert Smalls Parkway and Goethe Hill Road Site Location Map

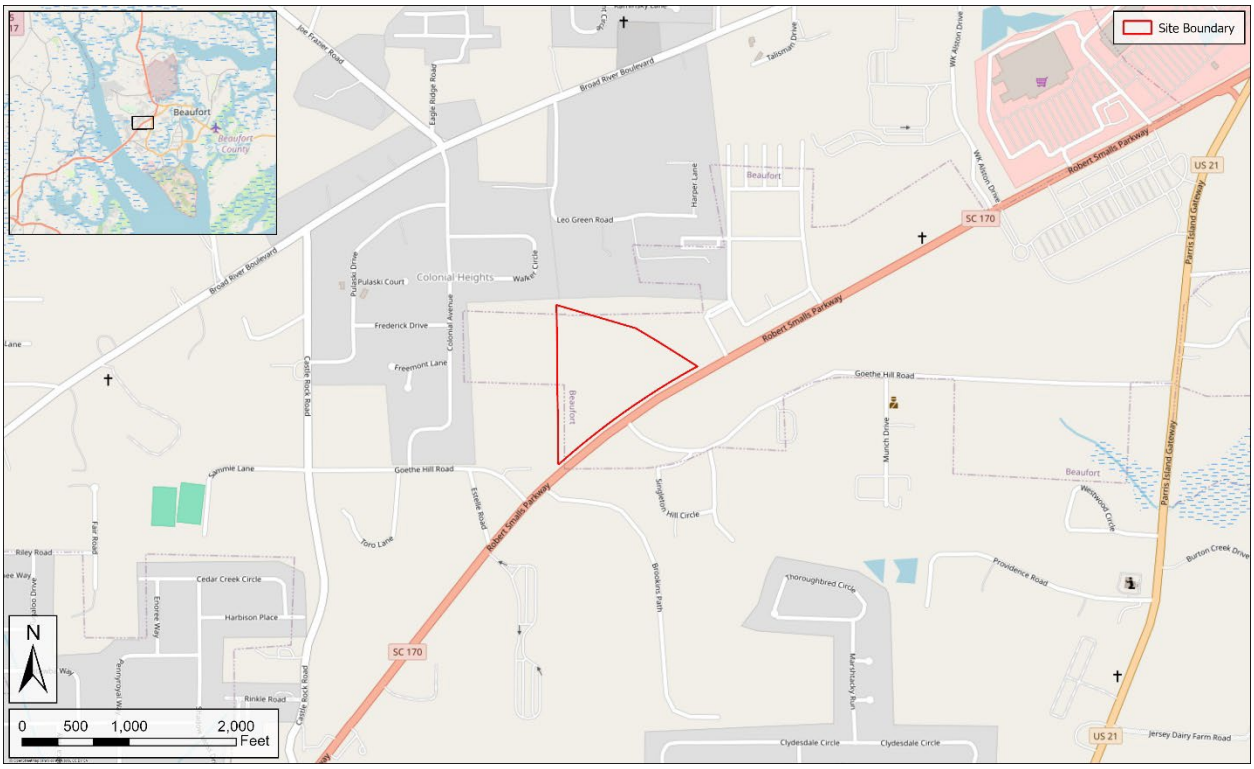
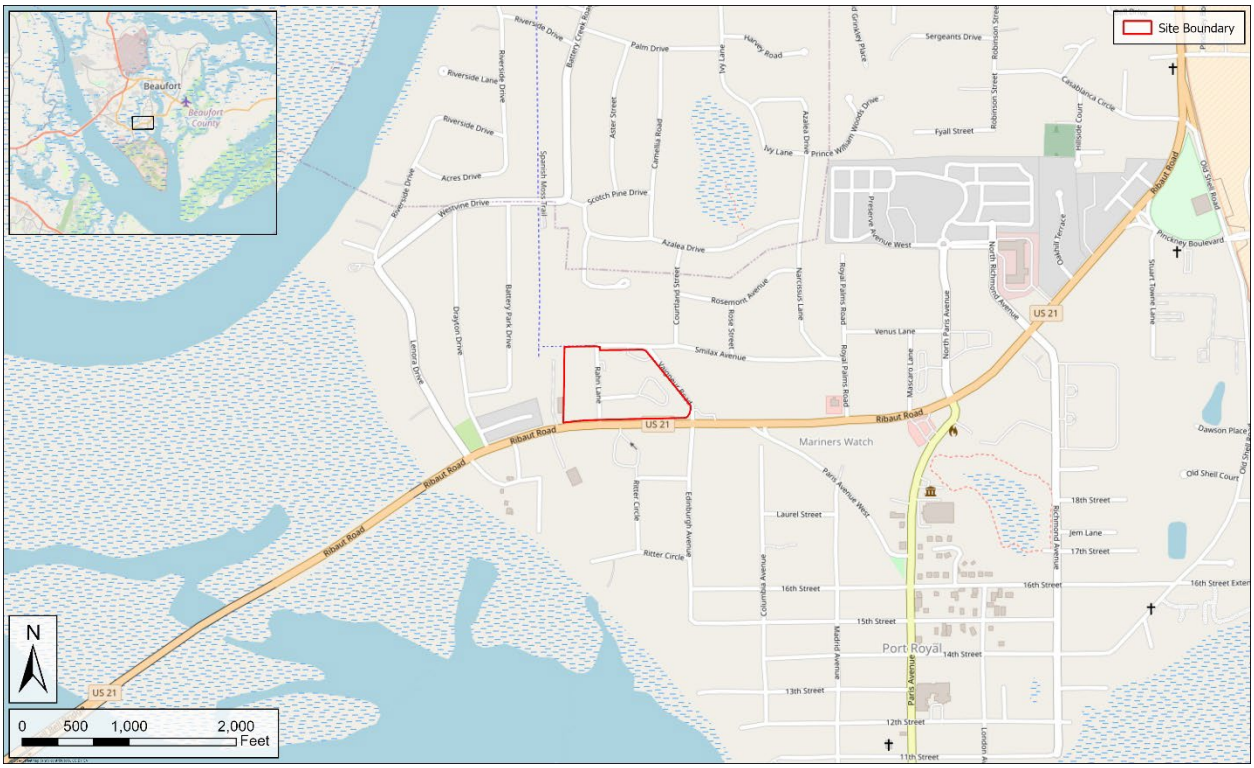


Figure 3. Alternative 3 – 1844 Ribaut Road Site Location Map



1.1 Background

The VA Charleston Health Care System consists of the main Ralph H. Johnson VA Medical Center (VAMC) and nine outpatient clinics, including one in Beaufort. The locations of the existing Beaufort OPC and the VAMC, along with their distances from the proposed Alternative sites, are presented in Table 1.

Table 1. Existing Beaufort VA Clinic and Main Ralph H. Johnson VAMC

Facility	Address	Distance from Alternative 1, 2, and 3
Ralph H. Johnson VAMC	109 Bee Street, Charleston, SC 29401-5799	54 miles NE
Beaufort VA Outpatient Clinic (located within the Beaufort Naval Hospital)	1 Pinckney Boulevard, Beaufort, SC 29902-6122	4.5 miles E (Alternatives 1 and 2) 1 mile E (Alternative 3)
Brunswick VA Clinic	93 Benchmark Way Brunswick, GA 31520-1858	91 miles S
Charleston VA Community Resource & Referral Center	2424 City Hall Lane, Community Resource & Referral Center (CRRC), Suite B North Charleston, SC 29406-6538	53 miles NE
Goose Creek VA Clinic	2418 NNPTC Circle Goose Creek, SC 29445-6314	59 miles NE
John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic	500 East Oglethorpe Highway Hinesville, GA 31313-2804	62 miles SW
Myrtle Beach VA Clinic	1800 Airpark Drive Myrtle Beach, SC 29577-1412	135 miles NE
North Charleston VA Clinic	6450 Rivers Avenue North Charleston, SC 29406-4882	54 miles NE
Savannah VA Clinic	1170 Shawnee Street Savannah, GA 31419-1618	38 miles SW
Trident VA Clinic	9237 University Boulevard North Charleston, SC 29406-8908	55 miles NE

1.2 Purpose and Need

The purpose of the Proposed Action is to provide outpatient health care services to area Veterans.

The Proposed Action is needed to address space gaps and operational inefficiencies at existing clinics within the VA Charleston Health Care System that were identified through the VA Strategic Capital Investment Planning (SCIP) process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

VA reviewed alternative approaches for meeting the purpose of and need for the Proposed Action. This section describes in detail the Proposed Action and the No Action alternative.

2.1 Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an OPC for VA to lease and operate in Beaufort County, SC. The private entity would construct the OPC on a "build-to-suit" basis for VA to lease for up to 20 years.

Under Alternative 1, 2, or 3, the private entity would design and construct the OPC in compliance with applicable VA design requirements and applicable federal, state, and local regulations, as well as meeting Green Building Initiative Green Globes certification (GBI 2025), which would minimize energy-related emissions using energy-efficient systems where feasible. Prior to construction, the private entity would be responsible for obtaining all applicable federal, state, and local permits from appropriate government authorities. Construction would take approximately 18-24 months, with operation of the OPC to follow.

Construction would involve clearing the site of existing vegetation within the proposed limits of disturbance, grading, excavation for the building foundation and utilities, installing new utility lines, constructing the OPC, and paving for roads, parking, and new entrances. The OPC is anticipated to be no more than three stories and would include approximately 500 asphalt-paved parking spaces. Construction would require the use of diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), transport of building materials to the site using on-road multi-axle delivery vehicles, travel to and from the site by construction workers, asphalt paving, and vertical construction of the OPC and associated infrastructure.

Following construction, the VA Charleston Health Care System would administer and staff the OPC, with approximately 100 new staff anticipated. The OPC would provide enhanced primary care, mental health, and specialty care outpatient services to Veterans in the Beaufort County area and surrounding communities. The OPC would provide services from approximately 7:00 a.m. to 5:00 p.m., Monday through Friday, although the operating hours are subject to change. Services are anticipated to include audiology, mental health, telehealth, ambulatory care, an eye clinic, physical and occupational therapy, prosthetics, dental services, a lab and pharmacy, and ancillary and diagnostic services.

2.1.1 Action Alternatives

VA is considering offers received from three private entities that have proposed conceptual designs for the OPC and supporting infrastructure at one of the three potential sites. Under the Proposed Action, VA would select only one of the three Alternatives for the OPC. This EA identifies the three action alternatives as Alternatives 1, 2, and 3, as described in the following list:

2.1.1.1 Alternative 1 - 708 Robert Smalls Parkway

The site is located at 708 Robert Smalls Parkway, Town of Port Royal, Beaufort County, SC. The site is approximately 27 acres and is undeveloped, wooded land comprised of two adjacent parcels (Parcel IDs: R112-031-000-017C-0000 and R112-031-000-0017-0000). The site is surrounded by residential development. The Alternative 1 conceptual development plan shows that approximately 15.6 acres in the western portion of the site would be developed for the OPC and supporting infrastructure, with the remainder of the site undeveloped.

2.1.1.2 Alternative 2 - Robert Smalls Parkway and Goethe Hill Road

The site is located at Robert Smalls Parkway and Goethe Hill Road, north of the intersection with Goethe Hill Road, City of Beaufort, Beaufort County, SC. The site is approximately 16 acres and is undeveloped, wooded land on one parcel (Parcel ID: R120-028-000-0138-0000). The site is surrounded by residential development. The Alternative 2 conceptual development plan shows that approximately 13 acres of the site would be developed for the OPC and supporting infrastructure, with the remainder of the wooded area on the northeastern portion of the site remaining undeveloped.

2.1.1.3 Alternative 3 - 1844 Ribaut Road

The site is located at 1830 and 1844 Ribaut Road, Town of Port Royal, Beaufort County, SC. The site is approximately 11 acres and consists of three abutting parcels (Parcel IDs: R110-008-000-0114-0000, R110-008-000-0115-0000, R110-008-000-0118-0000). The western portion of the site is developed with three commercial buildings, and the eastern portion is developed with the former Sea Islands residential apartment complex with 10 residential apartment buildings no longer in use. A right-of-way (Parcel ID: R110 008 000 0701 0000) identified as Rahn Lane separates the commercial and residential developments at the site. The site is surrounded by residential and commercial development. The Alternative 3 conceptual development plan shows that the entire site would be redeveloped for the OPC and supporting infrastructure.

Table 2 provides a comparison of the proposed design elements for Alternatives 1, 2, and 3, including the proposed OPC footprint, roadway entrances, stormwater detention ponds, and impervious surface area following development of the site. The conceptual design renderings for Alternatives 1, 2, and 3, are provided in Figure 4, Figure 5, and Figure 6, respectively.

Table 2. Conceptual Design Elements for Alternatives 1, 2, and 3

Action Alternative	Total site area (approx. acres)	Building footprint (approx. sf)	Roadway entrances	Stormwater detention ponds	Impervious surface area (approx. acres)
Alternative 1	27	66,000	2	2	11
Alternative 2	16	51,000	2	3	8
Alternative 3	11	48,000	4	1	9

Figure 4. Alternative 1 – Beaufort OPC Conceptual Design

Figure 5. Alternative 2 – Beaufort OPC Conceptual Design

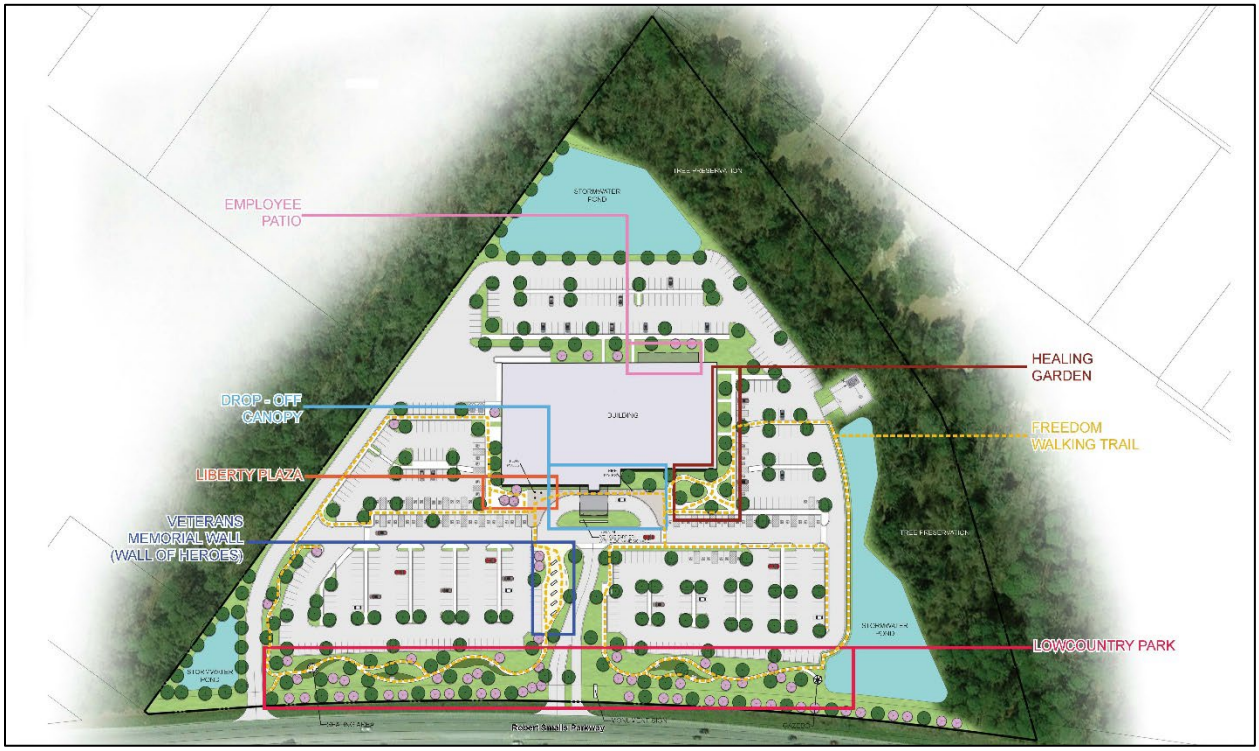


Figure 6. Alternative 3 – Beaufort OPC Conceptual Design

2.2 No Action

Under the No Action alternative, VA would not award a lease to a private entity for a new Beaufort OPC

and the Proposed Action would not be implemented. The No Action alternative does not meet the purpose of and need for the Proposed Action. However, VA evaluated the No Action alternative in this EA. The No Action alternative also provides a benchmark against which VA can compare the impacts of the Proposed Action.

2.3 Summary of Alternatives

VA has identified three alternatives and the No Action alternative. A single alternative—either Alternative 1, 2, or 3—would be selected by VA for implementation. The final decision will be based on a comprehensive evaluation of environmental, technical, and operational factors.

The analysis of environmental impacts in this EA focuses on these alternatives to determine the most suitable development plan for the Proposed Action. No other action alternatives were identified by VA that meet the purpose and need for action.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section describes the existing conditions at the Alternative 1, 2, and 3 sites and presents an analysis of the potential impacts of implementing the Proposed Action or the No Action alternative on the human environment. The affected environment includes the site, and, depending on the resource, a region surrounding the site. When describing the impacts associated with the Proposed Action, the impacts apply to Alternatives 1, 2, and 3; in cases where impacts are unique to Alternative 1, 2, or 3, a separate subheading for the analysis is provided.

To ensure consistency in the evaluation of potential environmental effects, this section defines key impact terminology used throughout the EA. These definitions clarify the nature, scale, and duration of impacts, as well as temporary and permanent changes. Impact intensity is categorized to reflect the degree of change a resource may experience due to the Proposed Action. The following definitions provide a standardized framework for assessing environmental consequences.

- **Permanent Impacts:** Effects that are caused by the action and result in irreversible changes to the environment, such as the permanent loss of wetlands due to development.
- **Temporary Impacts:** Effects that are caused by the action and are reversible and last for a limited period, such as noise disturbances during construction.
- **Negligible Impacts:** Effects that are so minor that they do not noticeably alter any important attribute of the resource.
- **Minor Impacts:** Effects that are detectable but do not significantly alter the resource's attributes.
- **Moderate Impacts:** Effects that are readily apparent and alter the resource noticeably but do not threaten its integrity.
- **Adverse Impacts:** Effects that are detrimental or harmful to the environment, such as pollution leading to the decline of wildlife populations.
- **Beneficial Impacts:** Effects that are advantageous or positive, like restoration projects improving habitat quality.

For the purposes of this EA, a significant impact is an effect on the environment that is substantial in magnitude or duration, considering factors such as the extent of environmental change, potential harm to public health or natural resources, and whether the impact is irreversible. The determination of significance considers both the intensity of the impact and the broader environmental and societal context in which it occurs. If the analysis in this EA identifies significant impacts, a more detailed Environmental Impact Statement may be required to further evaluate those effects and identify mitigation measures.

3.1 Environmental Resources Included in this EA for Detailed Analysis

Based on the results of VA's internal and external scoping, the following resources analyzed in this EA include: aesthetics; air quality; wildlife and habitat; floodplains, wetlands and coastal zone; cultural and historic resources; geology and soils; hydrology and water quality; land use; noise and vibration; solid waste and hazardous materials; traffic, transportation, and parking; utilities; community services; and socioeconomics. A definition of the environmental resource is provided in italics at the start of each section.

3.2 Aesthetics

Aesthetics refers to the visual interaction between an individual and the environment.

3.2.1 Affected Environment

3.2.1.1 Proposed Action - Alternative 1

The Alternative 1 site is located at 708 Robert Smalls Parkway (SC-170), west of the intersection of Robert Smalls Parkway and Shadow Moss Drive, in the City of Beaufort. The site is approximately 27 acres and consists of a large, densely wooded area. Residential areas are to the north, east, and west of the site. Views towards the site from these residential areas are obstructed by woodland. To the south along Robert Smalls Parkway is an apartment complex and commercial buildings. The Alternative 1 site has no scenic resources, prominent scenic vistas, and there are no state scenic highways or any other notable visual resources in the vicinity of the site.

3.2.1.2 Proposed Action - Alternative 2

The Alternative 2 site is also located northeast of the intersection of Robert Smalls Parkway and Goethe Hill Road in the City of Beaufort. The site is approximately 16 acres and consists of a large, wooded area. Residential areas are to the north, east, and west of the site. Views of the site from these residences are obstructed by woodland. Commercial development is present to the south and southeast of the site. The Alternative 2 site has no scenic resources, prominent scenic vistas, and there are no state scenic highways or any other notable visual resources in the vicinity of the site.

3.2.1.3 Proposed Action - Alternative 3

The Alternative 3 site is located northwest of the intersection of Ribaut and Vaigneur Roads in the Town of Port Royal. The site is approximately 11 acres and comprises developed land consisting of a residential apartment complex and light industrial commercial facilities. Rahn Lane runs in a north-south direction through the central portion of the site and separates the commercial area to the west and the residential area to the east. Smilax Avenue runs along the northern boundary of the site. To the south is a commercial area along Ribaut Road. The land to the north, east, and west of the site is predominantly residential. Utility lines border the north and south boundaries of the site. The Alternative 3 site has no scenic resources, prominent scenic vistas, and there are no state scenic highways or any other notable visual resources in the vicinity of the site.

3.2.2 Environmental Consequences

3.2.2.1 Proposed Action – Alternative 1

3.2.2.1.1 Construction

Construction of the Proposed Action at the Alternative 1 site would involve the presence of construction equipment, vehicles, materials, and related activity that would temporarily affect the visual aesthetics of the site. Construction would require clearing the site interior of existing vegetation, grading and compacting exposed soil, excavation for utilities, paving for new entrances and parking areas, and vertical construction of the OPC.

Construction activities at the Alternative 1 site would be visible to passersby on Robert Smalls Parkway. These activities would temporarily convert the current visual aesthetic of the site from woodland to an active construction area. If necessary, the construction contractor would erect temporary construction privacy fencing to obstruct views into the site during the construction phase.

Therefore, construction of the Alternative 1 site would have a temporary, moderate adverse impact on the visual aesthetics. This impact would end once the construction phase is complete.

3.2.2.1.2 Operation

The operation of the OPC at the Alternative 1 site would be visible to passersby along Robert Smalls Parkway. The size and scale of the OPC development would be similar to other commercial developments in the area. The grounds at the OPC would be professionally maintained throughout the duration of VA's lease.

Therefore, the operation of the Proposed Action at the Alternative 1 site would have a permanent, minor adverse impact on aesthetics.

3.2.2.2 Proposed Action – Alternative 2

3.2.2.2.1 Construction

Construction of the Proposed Action at the Alternative 2 site would involve the presence of construction equipment, vehicles, materials, and related activity that would temporarily affect the visual aesthetics of the site. Construction would require clearing the site interior of existing wooded vegetation, grading and compacting exposed soil, excavation for utilities, paving for new entrances and parking areas, and vertical construction of the OPC.

Construction activities at the Alternative 2 site would be visible to passersby along Robert Smalls Parkway and Goethe Hill Road. These activities would temporarily convert the current visual aesthetic of the site from woodland to an active construction area. If necessary, the construction contractor would erect temporary construction privacy fencing to obstruct views into the site during the construction phase.

Therefore, construction of the Proposed Action at the Alternative 2 site would have a temporary, moderate adverse impact on visual aesthetics. This impact would end once the construction phase is complete.

3.2.2.2.2 Operation

The OPC would be visible to passersby along Robert Smalls Parkway and Goethe Hill Road. The size and scale of the OPC development would be similar to other commercial developments in the area. The grounds at the OPC would be professionally maintained throughout the duration of VA's lease.

Therefore, the operation of the Proposed Action at the Alternative 2 site would have a permanent, minor adverse impact on aesthetics.

3.2.2.3 Proposed Action – Alternative 3

3.2.2.3.1 Construction

Construction of the Proposed Action at the Alternative 3 site would involve the presence of construction equipment, vehicles, materials, and related activity that would temporarily affect the visual aesthetics of the site. Construction would require clearing the site interior of existing commercial and residential buildings, pavements, sparse vegetation, grading and compacting exposed soil, excavation for utilities, paving for new entrances and parking areas, and vertical construction of the OPC.

Construction activities for Alternative 3 would be visible to passersby on Ribaut Road, Vaigneur Road, and Smilax Avenue. Construction activities would temporarily convert the current visual aesthetic of the site from light industrial commercial and residential facilities to an active construction area. If necessary, the construction contractor would erect temporary construction privacy fencing to obstruct views into the site during the construction phase.

Therefore, construction of the Proposed Action at the Alternative 3 site would have a temporary, negligible adverse impact on visual aesthetics. This impact would end once the construction phase is complete.

3.2.2.3.2 Operation

The OPC at the Alternative 3 site would be visible to passersby along Ribaut Road, Vaigneur Road, and Smilax Avenue. The size and scale of the OPC development would be similar to other commercial developments in the area. The grounds at the OPC would be professionally maintained throughout the duration of VA's lease.

Therefore, the operation of Proposed Action Alternative 3 would have a permanent, minor beneficial impact on aesthetics at the site.

3.2.2.4 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at the site, though it could be developed by others. Therefore, the No Action alternative would result in no impact on aesthetics.

3.3 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and prevailing meteorological conditions.

3.3.1 Affected Environment

The U.S. Environmental Protection Agency (USEPA) and the SC Department of Environmental Services (SCDES) regulate air quality in the state of SC. SCDES develops rules, regulations, and policies for regulating air quality in accordance with applicable legislation. USEPA regulations may not be superseded; however, state, and local regulations may be more stringent.

3.3.1.1 Federal Air Quality Standards

The Clean Air Act of 1970 (42 U.S. Code 7401 et seq.) authorizes USEPA to establish National Ambient Air Quality Standards (NAAQS) (40 Code of Federal Regulations [CFR] Part 50) that set acceptable upper concentration limits for the following criteria pollutants: particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$), sulfur dioxide (SO_2), carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), and lead (Pb).

The USEPA General Conformity Rule (GCR) requires federal agencies to demonstrate that actions that they undertake, approve, permit, or support in nonattainment and maintenance areas would conform to the appropriate USEPA-approved State Implementation Plan (40 CFR Parts 51 and 93). A conformity applicability analysis is the first step to assess whether a federal action must be supported by a full conformity determination. If the results of the applicability analysis indicate that the total emissions of a proposed project would not exceed GCR *de minimis* emissions thresholds, then the conformity evaluation process is complete. If total emissions would equal or exceed federal GCR *de minimis* thresholds, then a full conformity determination is required to ensure that federal actions do not cause or contribute to violations of the NAAQS or affect NAAQS attainment.

Areas that violate NAAQS are designated as nonattainment areas; areas with levels below NAAQS are designated as attainment areas. An area may also be classified as a maintenance area if it were once

classified as nonattainment but has since reached attainment through implementation of a maintenance plan. Beaufort County, SC is designated by USEPA as being in attainment for all criteria pollutants (USEPA 2025). Because Beaufort County is designated as in attainment for all criteria pollutants, the GCR does not apply. Therefore, emissions from temporary mobile construction activities are evaluated using the Prevention of Significant Deterioration (PSD) major source thresholds (250 tons per year for criteria pollutants; 25 tons per year for lead) as conservative insignificance indicators. These insignificance indicators provide a useful benchmark for determining whether emissions from the Proposed Action would be expected to cause meaningful air quality impacts in an attainment area.

3.3.1.2 Greenhouse Gases

Greenhouse gases (GHGs) include carbon dioxide (CO_2), methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorocarbons. The global warming potential of these GHGs is measured relative to CO_2, the most abundant GHG, and GHG emissions are typically expressed in terms of pounds or metric tons of "CO_2 equivalents" or CO_2e.

3.3.1.3 Sensitive receptors

Sensitive receptors for air quality impacts are those that are the most sensitive to pollution impacts, such as young children, older adults, or people with respiratory and other related illnesses. Sensitive receptors include schools, daycare facilities, nursing homes, and religious institutions.

3.3.1.3.1 Proposed Action - Alternative 1

Sensitive receptors within an approximately one-mile radius of the Alternative 1 site include:

- **North:** Broad River Elementary School; Porter School; Third Macedonia Baptist Church
- **South:** Alpha Christian Child Development Center; Calvary Baptist Church
- **East:** Bridges Preparatory School
- **West:** None

3.3.1.3.2 Proposed Action - Alternative 2

Sensitive receptors within an approximately one-mile radius of the Alternative 2 site include:

- **North:** Faithful Christian Church; Decibel Church; Jericho Church; Canaan Church; Battery Creek High School; Jericho School; Robert Smalls Middle School
- **South:** Bridges Preparatory School; Peace of Mind Academy LLC; Victory Baptist Church; Love House Ministries; Saint Paul's Church
- **East:** Robert Smalls Leadership Academy; Jehovah's Witness Kingdom Hall; Christ Our Lord Episcopal Church; Beaufort Christian School
- **West:** Broad River Elementary School; Third Macedonia Baptist Church; Porter School

3.3.1.3.3 Proposed Action - Alternative 3

Sensitive receptors within an approximately one-mile radius of the Alternative 3 site include:

- **North:** Beaufort Middle School; Mossy Oaks Elementary School; Mossy Oaks Kindergarten-Preschool; Beaufort-Jasper Headstart Preschool; Cottages at Beaufort; Bethel Tabernacle Church
- **South:** Port Royal Elementary School; Port Royal United Methodist Church; St Mark's Center; Union Church of Port Royal

- **East:** The Little Brown School; Sea Island Sprouts; Helena Square Retirement Community; Sprenger Health Care of Port Royal; Old Fort Baptist Church; Port Royal Baptist Church; Porter Chapel Church; Union Church
- **West:** None

3.3.2 Environmental Consequences

Construction emissions are primarily based on estimated operational time and number of workdays to complete each phase of the Proposed Action. Criteria pollutant emissions for construction of the Proposed Action were estimated using the U.S. Air Force's Air Conformity Applicability Model (ACAM). Although a construction period from 2026 to 2027 was used in the model, the actual dates may occur later. Because emissions from construction equipment generally decrease over time as newer, more efficient technologies replace older models, the 2026 to 2027 timeframe provides a reasonable upper bound for anticipated emissions. If construction occurs later, emissions would likely be lower due to the continued adoption of cleaner and more efficient equipment.

Under either Alternative 1, 2, or 3, the Proposed Action would produce construction-related emissions over an approximately 18- to 24-month construction period. Construction activities would generate criteria pollutants from the use of diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), on-road heavy-duty vehicles (multi-axle delivery vehicles), construction workers' passenger vehicles, curing of asphalt pavement, and interior painting. Construction would also generate fugitive dust from land clearing and earth moving activities. The construction-related emissions would stop once construction is completed.

The estimated construction emissions calculated for Alternatives 1, 2, and 3 are similar, as shown in Table 3, Table 4, and Table 5 respectively. The tables use emissions of volatile organic compounds (VOC) to represent O_3 because VOCs may form ground-level O_3 by "reacting" with sources of oxygen molecules such as nitrogen oxides, and CO in the atmosphere in the presence of sunlight. Under Alternatives 1, 2, or 3, the annual net changes in estimated emissions associated with construction of the OPC are below the PSD insignificance indicators. The insignificance indicators are trivial (*de minimis*) rate thresholds that have been demonstrated to have little to no impact to air quality. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Any action with net emissions below the insignificance indicators for all criteria pollutants is considered so insignificant that the action will not cause or contribute to an exceedance on one or more NAAQS.

GHG emissions generated during construction were also evaluated. Under Alternative 1, 2, or 3, construction of the Proposed Action would result in temporary GHG emissions from combustion of fossil fuels in construction equipment and vehicles, material production and transportation, and site preparation activities, including soil disturbance and grading. The GHG emissions from construction would end once the construction phase is finished. Though negligible, construction of either Alternatives 1, 2, or 3 would contribute GHG emissions to the region, but these emissions would stop once construction is completed.

To further reduce criteria pollutants and GHG emissions during construction of the Proposed Action, the private entity may incorporate the following strategies to the extent practicable:

- For construction equipment greater than 150 horsepower, aim to meet USEPA Tier 4 emissions standards, or Tier 3 standards if Tier 4 equipment is not available at the time of construction.
- Tune and maintain all construction equipment in accordance with the equipment manufacturer's recommended maintenance schedule and specifications.
- Use low-sulfur diesel or biodiesel in construction equipment.

- Minimize off-site tracking of loose soil and the generation of dust by implementing construction best management practices (BMPs).

The private entity would be required to design and construct the facility to meet the Green Building Initiative Green Globes certification (GBI 2025), which would minimize energy-related emissions using energy-efficient systems where feasible. Emissions would primarily result from increased vehicular traffic associated with patients, staff, and deliveries; HVAC systems; and monthly testing of two diesel-fueled emergency generators. The emissions associated with these operational activities are also shown in Table 3, Table 4, and Table 5 for Alternatives 1, 2, and 3, respectively. These operational emissions are below the insignificance indicators. Similar to the estimated construction emissions, 2028 was used in the ACAM model as the first year of operation; however, the actual start of operations may vary depending on the final construction timeline.

The following sections show the estimated emissions for construction and operation for each Alternative.

3.3.2.1 Proposed Action – Alternative 1

3.3.2.1.1 Construction

The estimated construction emissions associated with Alternative 1 are shown in Table 3. The annual net changes in estimated emissions associated with the construction of the Alternative 1 site are below the insignificance indicators.

These data show that construction of the Proposed Action at the Alternative 1 site would have a temporary, negligible adverse impact on air quality.

3.3.2.1.2 Operation

The estimated operation emissions associated with Alternative 1 are also shown in Table 3. The annual net changes in estimated emissions associated with operation of the Alternative 1 site are below the insignificance indicators.

As a result, the operation of the Proposed Action at the Alternative 1 site would have a permanent, negligible adverse impact on air quality.

Table 3. Alternative 1 – Criteria Pollutant and GHG Emissions from Construction and Operation of the Proposed Action

Criteria Pollutant	Year 1, construction emissions (ton/yr)	Year 2, construction emissions (ton/yr)	Year 3, operational emissions (ton/yr)	Insignificance Indicator (ton/yr)
VOC	0.207	1.710	0.355	250
NO_2	1.764	1.362	0.897	250
CO	2.155	1.840	5.393	250
SO_2	0.004	0.003	0.017	250
PM_{10}	18.347	0.047	0.068	250
$PM_{2.5}$	0.062	0.044	0.067	250
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	391	296	1,177	Not established
Methane	0.01543075	0.01139004	0.03093122	Not established
Nitrous oxide	0.00320799	0.00241458	0.02056884	Not established
CO_2e	392	297	1,181	Not established

3.3.2.2 Proposed Action – Alternative 2

3.3.2.2.1 Construction

The estimated construction emissions associated with Alternative 2 are shown in Table 4. The annual net changes in estimated emissions associated with construction of Alternative 2 are below the insignificance indicators.

These data show that construction of the Proposed Action at the Alternative 2 site would have a temporary, negligible adverse impact on air quality.

3.3.2.2.2 Operation

The estimated operation emissions associated with Alternative 2 are also shown in Table 4. The annual net changes in estimated emissions associated with operation of the Alternative 2 site are below the insignificance indicators.

As a result, the operation of the Proposed Action at the Alternative 2 site would have a permanent, negligible adverse impact on air quality.

3.3.2.3 Proposed Action – Alternative 3

3.3.2.3.1 Construction

The estimated construction emissions associated with Alternative 3 are shown in Table 5. The annual net changes in estimated emissions associated with construction of Alternative 3 are below the insignificance indicators.

These data show that construction of the Proposed Action at the Alternative 3 site would have a temporary, negligible adverse impact on air quality.

3.3.2.3.2 Operation

The estimated operation emissions associated with Alternative 3 are also shown in Table 5. The annual net changes in estimated emissions associated with operation of the Alternative 3 site are below the insignificance indicators.

As a result, the operation of the Proposed Action at the Alternative 3 site would have a permanent, negligible adverse impact on air quality.

3.3.2.4 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented, and existing air quality conditions would remain unchanged. Therefore, the No Action alternative would result in no impact on air quality.

Table 4. Alternative 2 – Criteria Pollutant Emissions and GHG Emissions from Construction and Operation of the Proposed Action

Criteria Pollutant	Year 1, construction emissions (ton/yr)	Year 2, construction emissions (ton/yr)	Year 3, operational emissions (ton/yr)	Insignificance Indicator (ton/yr)
VOC	0.207	1.570	0.351	250
NO_2	1.762	1.358	0.836	250
CO	2.154	1.838	5.341	250
SO_2	0.004	0.003	0.016	250
PM_{10}	21.597	0.047	0.064	250
$PM_{2.5}$	0.062	0.044	0.063	250
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	390	294	1,110	Not established
Methane	0.01541399	0.01135892	0.0296671	Not established
Nitrous oxide	0.00320568	0.00241028	0.01930472	Not established
CO_2e	391	295	1,114	Not established

Table 5. Alternative 3 – Criteria Pollutant and GHG Emissions from Construction and Operation of the Proposed Action

Criteria Pollutant	Year 1, construction emissions (ton/yr)	Year 2, construction emissions (ton/yr)	Year 3, operational emissions (ton/yr)	Insignificance Indicator (ton/yr)
VOC	0.200	1.293	0.316	250
NO_2	1.715	1.398	0.595	250
CO	2.092	1.911	4.807	250
SO_2	0.004	0.003	0.009	250
PM_{10}	12.167	0.049	0.038	250
$PM_{2.5}$	0.060	0.045	0.037	250
Greenhouse Gas	**Year 1, construction emissions (metric ton/yr)**	**Year 2, construction emissions (metric ton/yr)**	**Year 3, operational emissions (metric ton/yr)**	**Threshold**
CO_2	383	300	761	Not established
Methane	0.01502349	0.01169639	0.02277777	Not established
Nitrous oxide	0.00311597	0.00249046	0.01266012	Not established
CO_2e	384	301	764	Not established

3.4 Wildlife and Habitat

Considerations related to wildlife and habitat include the impacts of a project on wildlife including through direct habitat loss; habitat fragmentation; disruption of behavior; or the import, export, or taking of state or federally listed endangered species.

Species that are imperiled may be listed as endangered or threatened under the Endangered Species Act (ESA). In addition, specific locations may be mapped and identified as a listed species' designated critical habitat which support the continued conservation of imperiled species by guiding cooperation within the federal government. Under Section 7 of the ESA, all federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) about actions that they carry out, fund, or authorize to ensure that they will not harm a listed species (USFWS 2024).

3.4.1 Affected Environment

The Alternative 1, 2, and 3 sites are in the Sea Islands section of the Atlantic Coastal Plain province, an area of low elevation with relatively unconsolidated beds of terrestrially and marine-deposited sand, gravel, and clay sediments (Fenneman 1938); (Thornbury 1965). This is the flattest province in the state and gently slopes eastward through a sequence of terraces (National Park Service [NPS] 2024). The province consists of clastic sediments, and the landscape contains rivers that flow eastward and southeastward and carry sand, silt, and clay toward the ocean, sometimes depositing these soils within estuaries and marshes. The Sea Islands section is an area of coastal plain with a submerged coastal border (Fenneman 1938). The USEPA defines the ecoregion encompassing the Project area as the Sea Islands/Coastal Marsh within the Southern Coastal Plain. The Southern Coastal Plain is a variable region containing "barrier islands, coastal lagoons, marshes, and swampy lowlands" (Griffith 2001). This ecoregion was originally vegetated by a variety of species, including "longleaf pine, slash pine, pond pine, beech, sweetgum, southern magnolia, white oak, and laurel oak" (Griffith 2001). Currently, the region contains a significant amount of urban development, with other portions of the region cleared for pasture or citrus agriculture. Forests primarily consist of slash and loblolly pines. The landscape within the Sea Islands/Coastal Marsh region is affected by fluvial, aeolian, and oceanic forces, resulting in a highly dynamic and changing environment. The barrier islands consist largely of sandy soils, while the marshes largely consist of clayey and organic soils (Griffith 2001).

In December 2024, a biological habitat assessment was performed to assess the potential for federal and state protected species, critical habitats, or other sensitive resources to occur at the Alternative 1, 2, and 3 sites.

The assessment involved a desktop review of known federally and state listed species known at and within the vicinity of each site. The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC), which generates a list of federally threatened, endangered, proposed, and candidate species and habitats that may occur within or near the site. Additionally, available information was also obtained from the South Carolina Department of Natural Resources (SCDNR), South Carolina Natural Heritage Program (SCNHP) Natural Heritage Database (NHD), and other sources to identify the potential for the presence of state or federally listed species on or in the vicinity of each site. The assessment also considered the Migratory Bird Treaty Act (MBTA; 16 U.S.C. 703-712), which prohibits the pursuit, hunting, take, capture, kill, or sale of listed migratory bird species; and the Bald Eagle and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668-668c), which prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" eagles, including their parts, nests, or eggs.

Information collected during the desktop review was used in conjunction with the field assessment of land cover types to identify potential effects pursuant to the ESA.

The following sections describe the unique biological habitat assessment findings for the Alternative 1, 2, and 3 sites.

3.4.1.1 Proposed Action – Alternative 1

3.4.1.1.1 Land Cover

The Alternative 1 site has been undeveloped since at least 1985. The site was part of a larger forested area until 2008, when a residential development was constructed to the northeast of the site. In 2011 another housing development was built to the north of the site. In 2012, logging or land disturbance occurred within the western portion of the site. The habitat assessment identified four land cover classifications currently at the site, including mixed oak-pine forest, forested wetland, shrub/scrub wetland, and riverine. A land cover map is provided in Figure 7.

3.4.1.1.2 Federal Listed Species and Habitats

The USFWS IPaC report for the Alternative 1 site identified thirteen species protected under the ESA that have potential to occur within the site, including: one mammal, five birds, three reptiles, one insect species, and three flowering plants. The IPaC report did not identify any critical habitat of protected species on or near the site.

The on-site biological habitat assessment completed on December 3 and 4, 2024, found that the site had moderate potential for the following two federally listed species to occur:

- **Tricolored bat (*Perimyotis subflavus*):** The site has a large number of mature trees with suitable roost characteristics.
- **Pondberry (*Lindera melissifolia*)**: The palustrine forested wetland areas could provide suitable habitat for this deciduous shrub.

No suitable habitat was found for any other federally listed threated or endangered species.

3.4.1.1.3 State Listed Species and Habitats

SCDNR NHD identified state listed species with the potential to occur in Beaufort County. SCDNR also stated that the hoary bat (*Lasiurus cinereus*) and little brown bat (*Myotis lucifugus*), both of which are listed as highest conservation priority in the SCDNR State Wildlife Action Plan (SWAP), can be found in Beaufort and surrounding counties. SWAP species are those species of greatest conservation need not traditionally covered under any federally funded programs.

The on-site biological habitat assessment determined that the site had moderate potential for the following three state-listed species to occur:

- **Rafinesque's big-eared bats (*Corynorhinus rafinesquii*)**: This potential is due to the large number of mature trees with suitable roost characteristics, the presence of a potential maternity roost tree (large trees greater than 15 inches in diameter at breast height [DBH] with good roosting characteristics and 100% solar exposure), connectivity to other forested areas, and ready access to a perennial source of water.
- **Spotted turtle (*Clemmys guttata*)**: The wetland and stream areas could provide suitable habitat for this reptile.
- **Broad-striped dwarf siren (*Pseudobranchus striatus*)**: The wetland and stream areas could provide suitable habitat for this amphibian.

No suitable habitat was found for any other state listed, threatened, or endangered species.

Figure 7. Alternative 1 – Proposed Action Site Land Cover

3.4.1.1.4 Migratory Bird Treaty Act

The IPaC report identified birds of conservation concern (BCC) protected under the MBTA as having ranges with potential habitat overlapping the site. This identification reflects the species' potential to occur in the broader geographic region based on mapped habitat ranges but does not confirm the presence of suitable habitat or individuals at the site itself.

The on-site biological habitat assessment found that the site had moderate potential for the following seven BCC species to occur: American kestrel (*Falcosparverius paulus*), Brown-headed Nuthatch (*Sitta pusilla*), Eastern Whip-poor-will (*Antrostomus vociferus*), Prothonotary Warbler (*Protonotaria citrea*), Red-headed Woodpecker, (*Melanerpes erythrocephalus)*, Swallow-tailed Kite (*Elanoides forficatus*), and Wood Thrush (*Hylocichla mustelina*).

3.4.1.1.5 Bald and Golden Eagle Protection Act

The IPaC report stated there is likely habitat for bald eagles (*Haliaeetus leucocephalus*) overlapping the site. The on-site biological habitat assessment found the site had moderate nesting habitat for the bald eagle, but no eagles or eagle nests were observed during the assessment.

3.4.1.2 Proposed Action – Alternative 2

3.4.1.2.1 Land Cover

The Alternative 2 site is approximately 16 acres. The site has been an undeveloped forested area since at least 1985. The site was part of a larger forested area until 2023 when an apartment complex was developed to the northeast of the site. The habitat assessment identified three land cover classifications at the site, including mixed oak-pine forest, forested wetland, and riverine. A land cover map is provided in Figure 8.

3.4.1.2.2 Federal Listed Species and Habitats

The IPaC report for the Alternative 2 site identified thirteen species protected under the ESA that have potential to occur within the site, including: one mammal, five birds, three reptiles, one insect species, and three flowering plants. The IPaC report did not identify any critical habitat of protected species on or near the site.

Similar to the Alternative 1 site, the Alternative 2 site biological habitat assessment completed on December 3 and 4, 2024, found that the site had moderate potential for the following two federally listed species to occur:

- **Tricolored Bat (*Perimyotis subflavus*):** The site has a large number of mature trees with suitable roost characteristics.
- **Pondberry (*Lindera melissifolia*)**: The palustrine forested wetland areas could provide suitable habitat for this deciduous shrub.

No suitable habitat was found for any other federally listed threated or endangered species.

3.4.1.2.3 State Listed Species and Habitats

The SCDNR NHD identified state listed species with the potential to occur in Beaufort County.

The Alternative 2 on-site biological habitat assessment determined that the site had moderate potential for the following three state-listed species to occur:

- **Rafinesque's big-eared bats (*Corynorhinus rafinesquii*)**: This potential is due to the large number of mature trees with suitable roost characteristics, the presence of a potential maternity roost tree (large trees greater than 15 inches in diameter at breast height [DBH] with good roosting characteristics and 100% solar exposure), connectivity to other forested areas, and ready access to a perennial source of water.
- **Spotted turtle (*Clemmys guttata*)**: The wetland and stream areas could provide suitable habitat for this species.
- **Broad-striped dwarf siren (*Pseudobranchus striatus*)**: The wetland and stream areas could also provide suitable habitat for this amphibian.

3.4.1.2.4 Migratory Bird Treaty Act

The IPaC report identified BCC protected under the MBTA as having ranges with potential habitat overlapping the site. This identification reflects the species' potential to occur in the broader geographic region based on mapped habitat ranges but does not confirm the presence of suitable habitat or individuals at the site itself.

The Alternative 2 on-site biological habitat assessment found that the site had moderate potential for the following seven BCC species to occur: American kestrel (*Falcosparverius paulus*), Brown-headed Nuthatch (*Sitta pusilla*), Eastern Whip-poor-will (*Antrostomus vociferus*), Prothonotary Warbler (*Protonotaria citrea*), Red-headed Woodpecker, (*Melanerpes erythrocephalus)*, Swallow-tailed Kite (*Elanoides forficatus*), and Wood Thrush (*Hylocichla mustelina*).

3.4.1.2.5 Bald and Golden Eagle Protection Act

The IPaC report stated there is likely habitat for bald eagles overlapping the site. The on-site biological habitat assessment found the site had potentially suitable habitat for the bald eagle due to the forested land cover and large trees, but no eagles or eagle nests were observed during the assessment.

3.4.1.3 Proposed Action – Alternative 3

3.4.1.3.1 Land Cover

The Alternative 3 site is approximately 11 acres. The biological assessment of the Alternative 3 site performed on December 4, 2024, found that the site is developed with commercial buildings, an apartment complex, and pavement. There were no wetlands or habitat suitable for endangered species at the site. Sparse, large trees, as defined by diameter at breast height (DBH), were observed at the Alternative 3 site, including live oaks (*Quercus virginiana*), loblolly pines (*Pinus taeda*), and southern red oaks (*Quercus falcata*). A land cover map is provided in Figure 9.

Figure 8. Alternative 2 – Proposed Action Site Land Cover

Figure 9. Alternative 3 – Proposed Action Site Land Cover

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action – Alternative 1 and Alternative 2

3.4.2.1.1 Construction

The biological habitat assessments found that both the Alternative 1 and Alternative 2 sites had potential habitat for the same federal and state listed species and MBTA birds.

Under Alternative 1 or 2, construction would remove the existing habitat at the site during land clearing and grading associated with construction. Due to this loss of potential habitat, VA made a preliminary determination of "may affect, not likely to adversely affect" for the federally listed tricolored bat and pondberry. State listed species having potential to be impacted by loss of habitat are Rafinesque's Big-eared Bat, Spotted turtle, and Broad-striped dwarf siren.

A "no effect" determination was made for all other federal and state listed species due to the lack of suitable habitat at either the Alternative 1 or 2 sites.

These effect determinations are based on the requirement that the private entity would implement impact avoidance measures before construction begins. VA requested written concurrence from USFWS and SCDNR on May 9, 2025, to confirm the effect determinations and the following avoidance measures. A response was received from SCDNR on June 9, 2025, and from USFWS on June 10, 2025. SCDNR provided additional guidance on avoidance measures for the spotted turtle and broad-striped dwarf siren; these measures are incorporated in this EA. Additionally, SCDNR stated that the hoary bat (*Lasiurus cinereus*) and little brown bat (*Myotis lucifugus*), both of which are listed as highest conservation priority in the SCDNR State Wildlife Action Plan (SWAP), can be found in Beaufort and surrounding counties, but did not identify any required avoidance measures. USFWS requested further information regarding the potential presence of suitable habitat for pondberry and indicated their review was still on-going. VA is continuing consultation with USFWS and will update the Final EA to reflect the outcome of the consultation. Copies of correspondence with SCDNR and USFWS are provided in Appendix D.

3.4.2.1.1.1 Tricolored bat

- Avoid tree clearing during the tricolored bat pup season from May 1 to July 15 and the winter torpor season from December 15 to February 15.

3.4.2.1.1.2 Pondberry

Potential pondberry habitat was identified in the palustrine forested wetland area. Should the private entity design and construct the OPC to avoid impacts to wetlands, then there would be no impacts to the potential pondberry habitat.

If impacts to the wetland habitat cannot be avoided, then the private entity would be required to adhere to the following impact avoidance measures:

- Prior to vegetation clearing, a survey would be required for pondberry during its active growth period. The survey may be conducted from February through March, or September through October. If pondberry is found within the site or is indicated within a one-mile radius of the site, the private entity must contact USFWS for further guidance about the need for compensatory mitigation, which could include on-site or off-site conservation designed to offset adverse impacts to the plant species by ensuring no net loss or even a net gain in conservation outcomes, for the species.

3.4.2.1.1.3 MBTA birds

- Avoid tree clearing during the MBTA birds nesting season from February 1 through September 10. If clearing is proposed during the nesting season, preconstruction clearance surveys for nesting birds would facilitate determination of nesting bird presence and the need for non-disturbance buffers.

3.4.2.1.1.4 Rafinesque's Big-eared Bat

- SCDNR recommends assuming presence and abiding by a clearing moratorium from May 1 to July 31. If avoidance of clearing during the recommended window is not practical, additional avoidance and minimization measures are required. These measures are described in detail in the SCDNR letter dated June 9, 2025, included in Appendix D.

3.4.2.1.1.5 Spotted Turtle

Potential habitat for the Spotted turtle was identified in the palustrine forested wetland and the shrub/scrub wetland areas at the Alternative 1 and 2 sites.

Because the proposed alternatives contain wetlands and the fact that spotted turtles are known to move considerable distances between and within habitats and the fact that they are known to occur within Beaufort, SCDNR recommends assuming the presence of spotted turtle at the site. To prevent the take of a spotted turtle, the private entity can either choose to avoid any construction in areas within or adjacent to aquatic resources (e.g. wetlands, streams) from January 15 through July 15, or utilize exclusion methods described in the SCDNR letter dated June 6, 2025, and included in Appendix D. These methods include installing silt fencing and trapping and relocating individual turtles.

3.4.2.1.1.6 Broad-striped Dwarf Siren

Potential broad-striped dwarf siren habitat was identified in the palustrine forested wetland area. Should the private entity design and construct the OPC to avoid impacts to wetlands, then there would be no impacts to the broad-striped dwarf siren.

If impacts to wetlands cannot be avoided, then the private entity would be required to adhere to the avoidance and minimization measures for the spotted turtle and as well additional measures specific to the broad-striped dwarf siren described in the SCDRN letter dated June 6, 2025, and included in Appendix D. These measures include trapping efforts to survey for individual sirens using dipnetting or funnel traps, and relocation of as many individuals as possible prior to construction.

A summary of the required time-of-year restrictions on vegetation clearing and additional impact avoidance measures are summarized in Table 6.

3.4.2.1.1.7 USFWS Consultation

The effect determinations described above are preliminary and are subject to continuing review by USFWS under Section 7 consultation. VA is continuing consultation with USFWS and will update the Final EA to reflect the outcome of the consultation. Copies of VA's correspondence with USFWS are provided in Appendix D.

3.4.2.1.1.8 SCDNR Consultation

VA sent biological concurrence letters to SCDNR on May 9, 2025, requesting concurrence with the above biological conclusions and requested any additional mitigation needed to ensure no adverse effects to state listed species during construction and operation of the OPC. SCDNR provided a written response on June 9, 2025, and provided information on avoidance measures and timing for the following state listed

species: spotted turtle, broad-striped dwarf siren, and Rafinesque's big-eared bat. This information has been incorporated in this EA. Copies of VA's correspondence with SCDNR are provided in Appendix D.

3.4.2.1.1.9 Tree Removal Permits

For Alternative 1, which is located in the Town of Port Royal, the Town of Port Royal's Code of Ordinances, Chapter 20, requires a tree removal permit before removing trees with a diameter of 6 inches or greater at chest height (Town of Port Royal 2025). Obtaining the permit requires a certified arborist's tree survey and adherence to any conditions set by the town, such as replacement planting or mitigation fees for commercial projects. The private entity would be responsible for obtaining the permit and implementing any permit-required mitigation.

For Alternative 2, which is located in the City of Beaufort, the City of Beaufort Community Development Department Code, Section 5.4 - Tree Removal, requires a tree removal/pruning application with a certified arborist report prior to tree clearing (City of Beaufort 2023). The private entity would be required to submit and obtain approval prior to clearing.

Therefore, with implementation of avoidance measures, construction of the Proposed Action at the Alternative 1 or 2 site would have a permanent, minor adverse impact on wildlife and habitat.

3.4.2.1.2 Operation

Under Alternative 1 or 2, no further clearing of vegetation would occur following completion of the construction phase. The ornamental landscaped vegetation planted and established at the site during the construction phase is not anticipated to provide suitable habitat for listed species. Listed species would utilize suitable habitat available elsewhere in their range.

Therefore, operation of the Proposed Action would have a permanent, negligible adverse impact on wildlife and habitat.

Table 6. Alternatives 1 and 2 – Time-of-Year Restrictions and Measures to Avoid Impacts to Wildlife

<table>
<tr><th>Species</th><th>Jan 1-15</th><th>Jan 15-31</th><th>Feb 1-15</th><th>Feb 15-28</th><th>Feb 16-28</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th><th>Jul 1-15</th><th>Jul 16-31</th><th>Aug</th><th>Sep 1-10</th><th>Sep 11-30</th><th>Oct</th><th>Nov 1-14</th><th>Nov 15-30</th><th>Dec 1-14</th><th>Dec 15-31</th></tr>
<tr><td>Tricolored bat, Rafinesque's big-eared bat</td><td colspan="4">Winter torpor season, no clearing</td><td colspan="4">Maternity roost tree survey conducted prior to tree clearing</td><td colspan="3">Pup season, no clearing (May 1-July 31)</td><td colspan="7">Maternity roost tree survey conducted prior to tree clearing</td><td>Winter torpor, no clearing</td></tr>
<tr><td>Pondberry</td><td colspan="3">Clearing dependent on result from survey</td><td colspan="4">Optimal survey window; inform USFWS about results</td><td colspan="6">Clearing dependent on result from survey</td><td colspan="3">Optimal survey window; inform USFWS about results</td><td colspan="4">Clearing dependent on result from survey</td></tr>
<tr><td>Spotted turtle, Broad-striped dwarf siren</td><td colspan="3">Silt fencing required prior to construction</td><td colspan="8">No clearing or construction activities within or adjacent to aquatic resources without approval from USACE and SCDNR (Wetlands can be cleared if they are completely devoid of surface water and are completely dry)

*Survey required for spotted turtle March 1st – May 15th, if avoidance and minimization measures cannot be completed

*Survey required for dwarf siren (fall-spring), if avoidance and minimization measures cannot be completed</td><td colspan="5">No restriction on clearing</td><td colspan="4">Silt fencing required prior to construction</td></tr>
<tr><td>MBTA Birds</td><td colspan="3">No restriction on clearing</td><td colspan="9">Nesting season, tree cavity search is required prior to clearing of trees</td><td colspan="8">No restriction on clearing</td></tr>
</table>

3.4.2.2 Proposed Action – Alternative 3

3.4.2.2.1 Construction

The biological habitat assessment confirmed the Alternative 3 site contained no suitable habitat for federal or state listed species. The Alternative 3 site is entirely developed with structures and paved areas and has few sparse mature trees interspersed among the residential apartment buildings on the eastern portion of the site.

3.4.2.2.1.1 Tree Removal Permit

The Town of Port Royal's Code of Ordinances, Chapter 20, requires a tree removal permit before removing trees with a diameter of 6 inches or greater at chest height (Town of Port Royal 2025). Obtaining the permit requires a certified arborist's tree survey and adherence to any conditions set by the town, such as replacement planting or mitigation fees for commercial projects. The private entity would be responsible for obtaining the permit and implementing any permit-required mitigation.

3.4.2.2.2 Operation

Under Alternative 3, no further clearing of vegetation would occur following completion of the construction phase. The ornamental landscaped vegetation planted and established at the site during the construction phase is not anticipated to provide suitable habitat for listed species. Listed species would utilize suitable habitat available elsewhere in their range.

Therefore, operation of the Proposed Action would have a permanent, negligible adverse impact on wildlife and habitat.

3.4.2.3 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at the site or the surrounding area. Therefore, the No Action alternative would result in no impact on wildlife and habitat.

3.5 Floodplains, Wetlands, and Coastal Zone

Development in a floodplain may result in adverse impacts to the floodplain that can lead to the degradation and loss of natural functions and habitat. In particular, development could have direct and indirect detrimental impacts on the quantity and quality of floodplain habitats used by fish and other wildlife.

Protecting wetlands before construction is crucial because wetlands act as natural filters for water preventing pollution from reaching waterways, help control flooding by absorbing excess rainwater, provide vital habitats for wildlife, and can contribute to shoreline erosion control.

The coastal zone is a legislatively defined geographic region that establishes the area regulated under the federal Coastal Zone Management Act (CZMA), encompassing both land and water areas. Federal agencies must show their projects are consistent with state programs to implement the CZMA.

3.5.1 Affected Environment

3.5.1.1 Proposed Action - Alternatives 1, 2, and 3

3.5.1.1.1 Coastal Zone

Beaufort County is one of the eight coastal zone counties in SC. Therefore, the Alternative 1, 2, and 3 sites are subject to SC coastal zone regulations. The SCDES evaluates activities within the coastal zone for consistency with the state's enforceable policies. This ensures decisions align with South Carolina's constitution, promoting clean air, pure water, recreational use of public lands, and conservation of natural resources and historical sites.

Federal agencies must certify that their proposed activities comply with the state's coastal zone management program, and SCDES has the authority to concur or object to these reviews. South Carolina's enforceable policies are detailed in Chapter III of the SC Coastal Management Program (SCCMP).

A Proposed Action could have a significant adverse effect on the coastal zone if it is inconsistent with enforceable policies under the SCCMP, as mandated by Section 307 of the CZMA. For the OPC commercial development, the relevant policies in SCCMP *Section IV: Commercial Development* were used to assess consistency.

3.5.1.2 Proposed Action - Alternative 1

3.5.1.2.1 Floodplains

The U.S. Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (FIRMette 45013C0142G, effective 3/23/2021) shows the Alternative 1 site is mostly located in Zone X, which FEMA defines as a "0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile" (FEMA 2024). The 0.2% annual chance flood hazard area is commonly referred to as the 500-year floodplain. The FEMA FIRMette shows the western portion of the site is not located in a mapped flood hazard area. Although the Alternative 1 site is mostly located in FEMA-mapped 500-year flood hazard area, FEMA does not define this as a special flood hazard area. The FEMA FIRMette is shown in Figure 10.

Although the Town of Port Royal promulgated a Flood Damage Prevention Ordinance (Ordinance 2010-12, effective November 10, 2010), it only applies to development within a special flood hazard area identified by FEMA (Town of Port Royal 2010). The Alternative 1 site is not located in a special flood hazard area and therefore is not subject to the requirements of this ordinance. Additionally, VA has determined that the proposed OPC does not meet the Town of Port Royal's ordinance definition of a "Critical Development," which is defined as development that is critical to the community's public health and safety, is essential to the orderly functioning of a community, stores or produce highly volatile, toxic or water-reactive materials, or houses occupants that may be insufficiently mobile to avoid loss of life or injury (Town of Port Royal 2010).

3.5.1.2.2 Wetlands and Other Waters of the U.S.

A survey for wetlands and other Waters of the U.S. (WOTUS) was performed at the Alternative 1 site on December 3 and 4, 2024. Two wetlands were identified and delineated at the site (Figure 11). Wetland W-1 is a palustrine forested (PFO) wetland covering 6.56 acres. Wetland W-2 is a combination of a PFO wetland covering 2.56 acres and palustrine scrub-shrub (PSS) wetland covering 2.65 acres, for a total of 5.21 acres. Although final jurisdictional determination only be established by USACE, VA provisionally determined that both wetlands are jurisdictional features, because they abut a perennial stream (S-1). This perennial stream, which is a secondary unnamed tributary to the Broad River, crosses the central portion of the site from north to south.

Figure 10. Alternative 1 – FEMA FIRMette

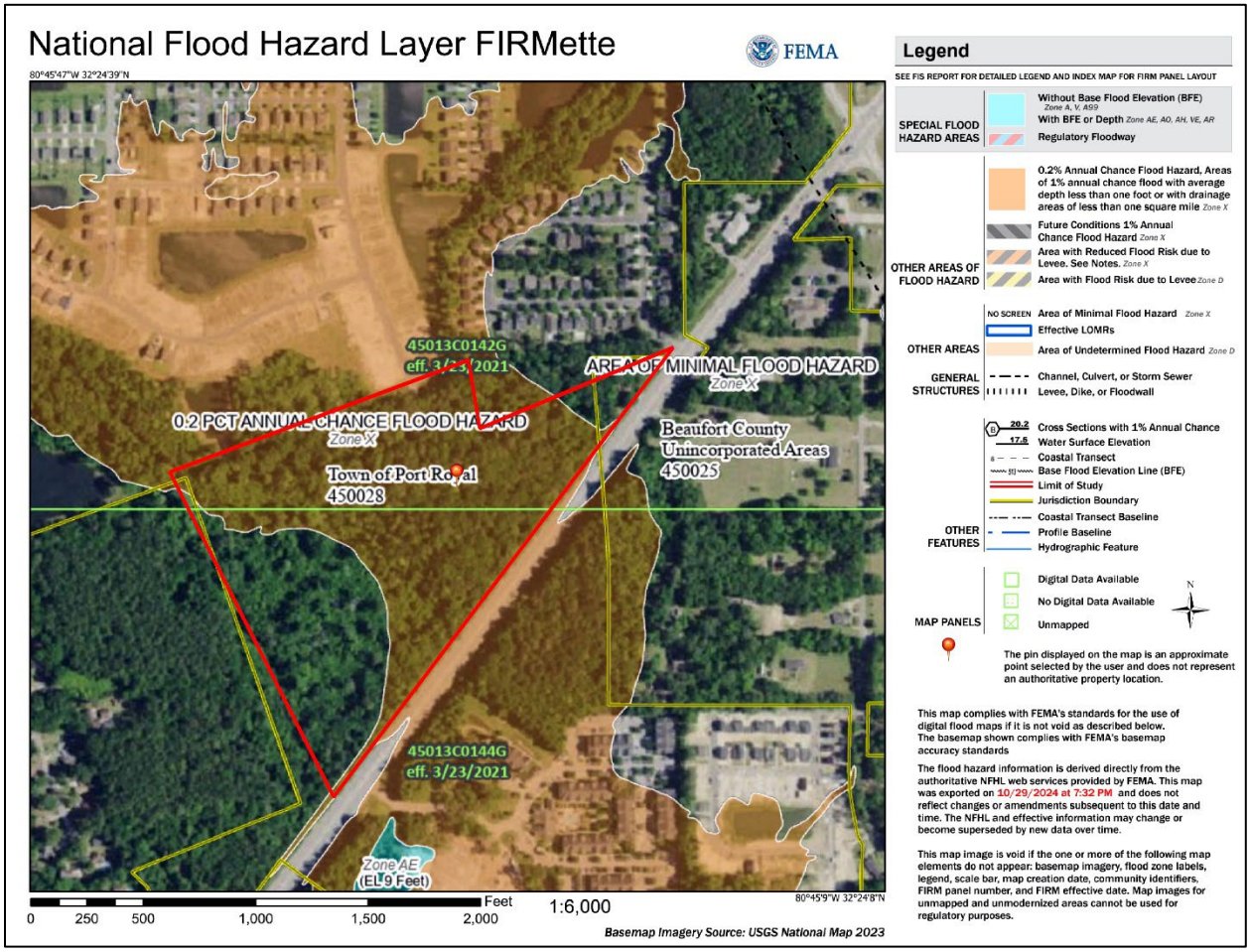


Figure 11. Alternative 1 – Wetlands and Waters of the U.S. Survey Findings

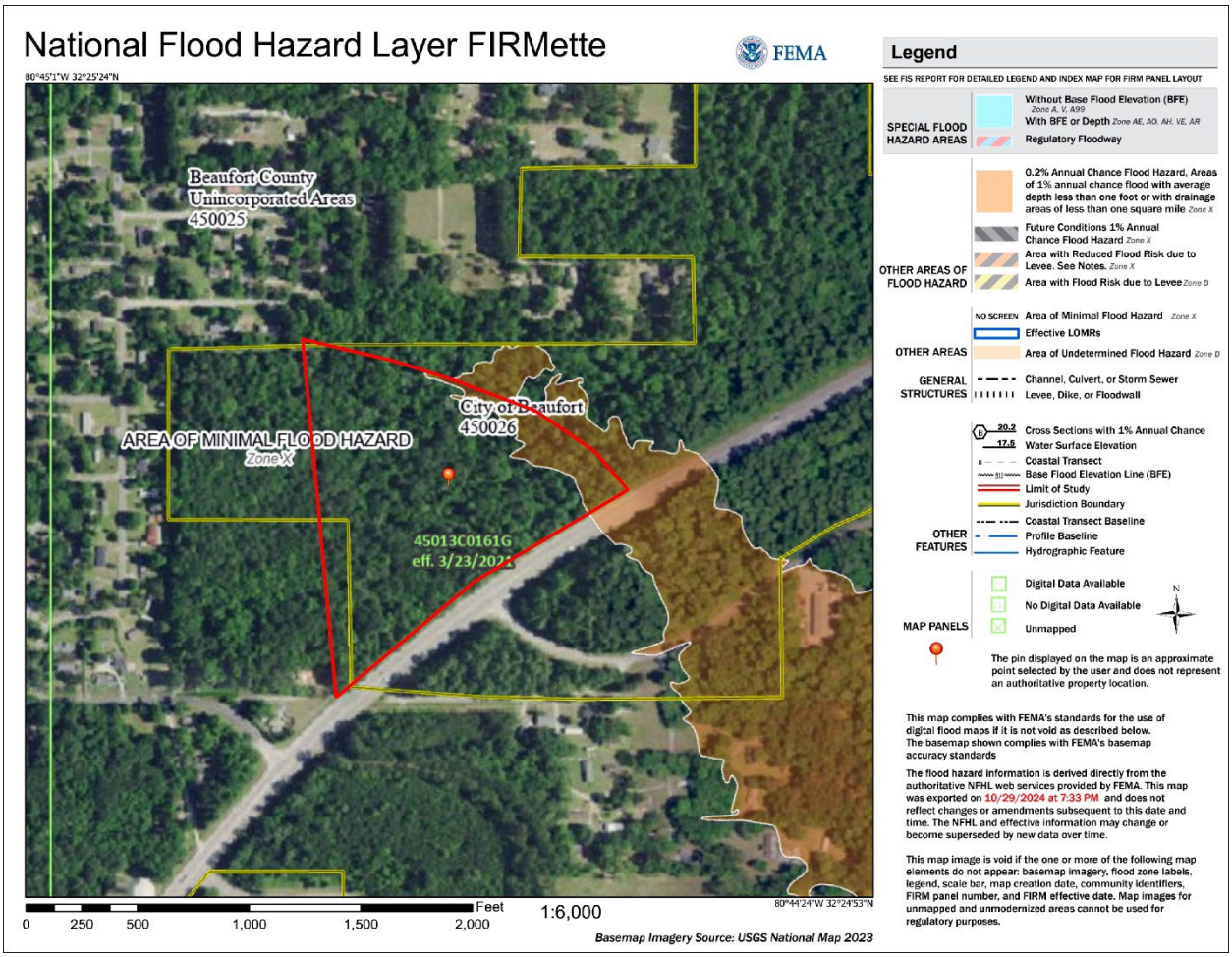
3.5.1.3 Proposed Action - Alternative 2

3.5.1.3.1 Floodplains

The FEMA FIRMette panel 45013C0161G (effective 3/23/2021) shows the northeastern portion of the Alternative 2 site is located in Zone X, which FEMA defines as a "0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile" (FEMA 2024). The 0.2% annual chance flood hazard area is commonly referred to as the 500-year floodplain. The FEMA FIRMette shows the remainder of the site is not located within a FEMA-mapped flood hazard area. The FEMA FIRMette is shown in Figure 10.

The City of Beaufort Code of Ordinances (Part 5 – Planning and Development, Chapter 4 – Flood Damage Prevention) applies to both FEMA-mapped special flood hazard areas and other areas with the potential of flooding, including the "Zone X" 500-year flood hazard areas (City of Beaufort 2025). This ordinance is intended to minimize damage to facilities in flood hazard areas by requiring structures to be elevated above the base flood elevation or using floodproofing design elements.

Figure 12. Alternative 2 – FEMA FIRMette



3.5.1.3.2 Wetlands and Other Waters of the U.S.

A survey for wetlands and WOTUS was performed at the Alternative 2 site on December 4, 2024. Two wetlands (W-1 and W-2) were identified and delineated at the site (Figure 13). Both wetlands W-1 and W-2 are PFO wetlands. Wetland W-1 covers approximately 0.38 acres, while W-2 covers approximately 3.4 acres. Wetland W-1 appears to be an isolated depressional PFO wetland situated in the central portion of the site. Wetland W-2 is present within the depressional areas of the site abutting intermittent stream S-1. The stream (S-1) is an intermittent secondary unnamed tributary to Battery Creek and was located along a portion of the northern boundary of the site. VA provisionally determined that wetland W-1 is isolated due to its lack of connection to a jurisdictional feature, while wetland W-2 is a provisionally jurisdictional feature because it abuts the S-1 intermittent stream.

3.5.1.4 Proposed Action - Alternative 3

3.5.1.4.1 Floodplains

The FEMA FIRMette (45013CO164G, effective 3/23/2021) shows the Alternative 3 site is not located in a mapped flood hazard area (FEMA 2024). The FEMA FIRMette is shown in Figure 14.

3.5.1.4.2 Wetlands

There are no wetlands present at the Alternative 3 site.

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action - Alternatives 1, 2, and 3

3.5.2.1.1 Coastal Zone

VA evaluated Alternatives 1, 2, and 3 for their consistency with SCCMP enforceable policies, as indicated in Table 7. Alternatives 1 and 2 would conform to all SCCMP enforceable policies, with the potential exception of the policy to avoid impacts to wetlands (SCCMP Chapter III, Section IV – Policy 1.b). Although the conceptual development plans for Alternatives 1 and 2 show potential impacts to wetlands, should the final design for the OPC development under Alternative 1 or 2 entirely avoid impacts to wetlands, then the Alternative 1 and 2 sites would comply with all SCCMP policies.

Therefore, construction and operation of the Proposed Action under Alternatives 1 or 2 is anticipated to have a permanent, minor impact on coastal zone resources should wetlands be impacted; should wetlands be avoided, then there would be no impact on coastal zone resources.

Alternative 3 would be consistent with all SCCMP enforceable policies. Therefore, construction and operation of the Proposed Action under Alternative 3 would have no impact on coastal zone resources.

The Draft EA has been made available to SCDES for reviewing VA's consistency determination with SCCMP enforceable policies. The findings from SCDES's consistency review will be included in the Final EA.

Figure 13. Alternative 2 – Wetlands and Waters of the U.S. Survey Findings

Figure 14. Alternative 3 – FEMA FIRMette

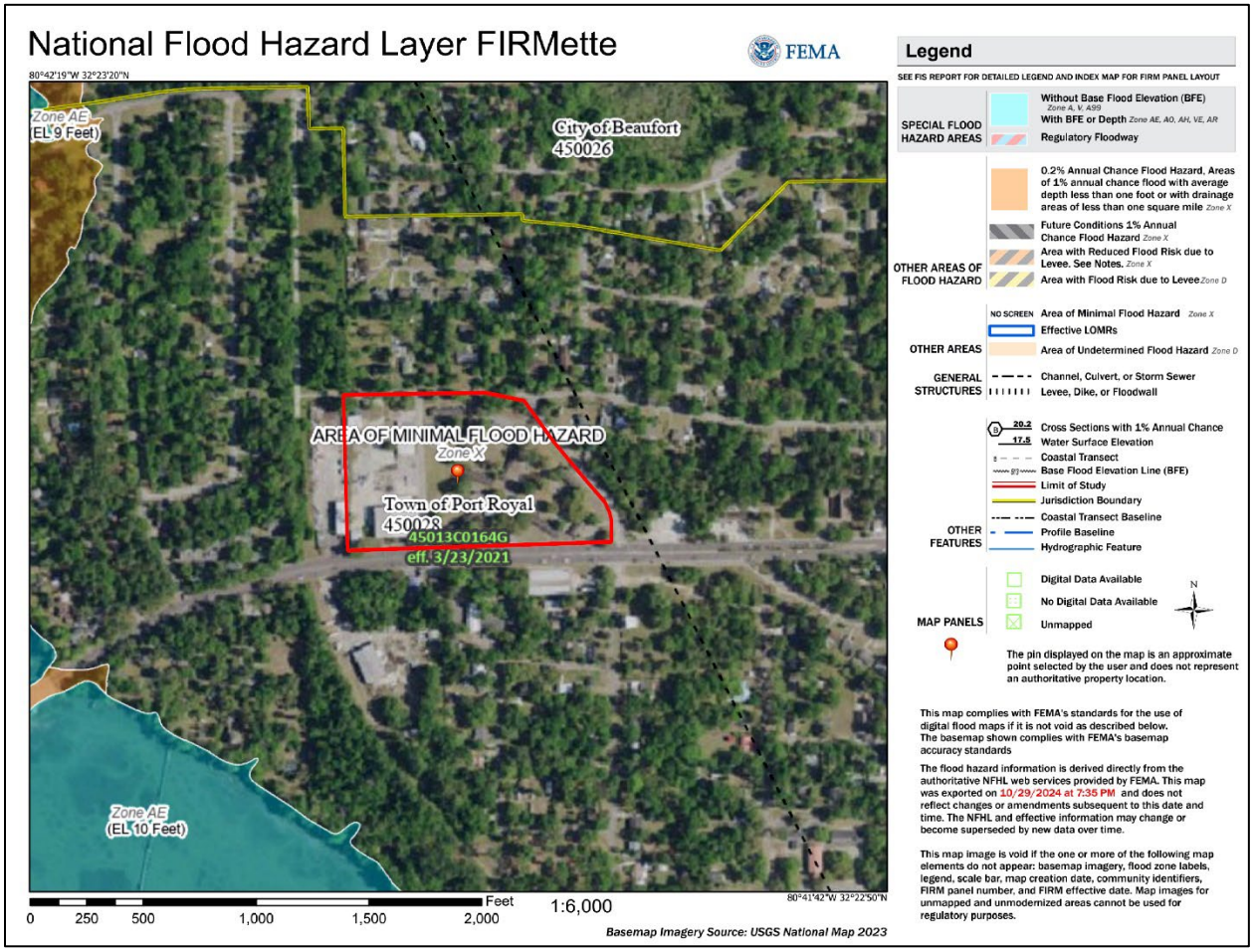


Table 7. Alternatives 1, 2, 3 – SCCMP Enforceable Policies Consistency Determination Review

SCCMP Enforceable Policy	Alternative 1	Alternative 2	Alternative 3
Chapter III, Section IV – Policy 1.a For locations immediately adjacent to the shoreline, water-dependent commercial activities will be given priority consideration. Water-dependent is interpreted here to include activities which functionally require access to the shoreline, for example, ship or boat repair or commercial fishing. Second priority will be given to water-related commercial uses which are significantly enhanced economically by proximity to the shoreline, for example, motel or restaurant activities.	**Consistent**. None of the Alternative sites are located immediately adjacent to the shoreline.		
Chapter III, Section IV – Policy 1.b Commercial proposals which require fill or other permanent alteration of salt, brackish or freshwater wetlands will be denied unless no feasible alternatives exist, and the facility is water-dependent. Since these wetlands are valuable habitat for wildlife and plant species and serve as hydrologic buffers, providing for storm water runoff and aquifer recharge, commercial development is discouraged in these areas. The cumulative impacts of the commercial activity which exists or is likely to exist in the area will be considered.	**May be consistent pending final design**. The Alternative 1 conceptual plan shows development would fill a portion (approximately less than one acre) of the provisionally jurisdictional W-2 wetland in the northwestern portion of the site. However, the private entity could avoid wetland-related requirements by adjusting the final design to avoid wetland impacts. If filling a wetland is required, the private entity would apply for and obtain any necessary federal and state permits and implement any permit-required mitigation.	**May be consistent pending final design**. The Alternative 2 conceptual design shows development would fill the isolated W-1 wetland (0.38 acre) in the central portion of the site and potentially a portion of the provisionally jurisdictional W-2 wetland. However, the private entity could avoid wetland-related requirements by adjusting the final design to avoid wetland impacts. If filling a wetland is required, the private entity would apply for and obtain any necessary federal and state permits and implement any permit-required mitigation.	**Consistent.** There are no wetlands or waterbodies on the Alternative 3 site. The Proposed Action will not fill or alter wetlands.

SCCMP Enforceable Policy	Alternative 1	Alternative 2	Alternative 3
Chapter III, Section IV – Policy 1.c Location of new commercial development in riverine and coastal areas where flooding has been a recurring, serious problem is discouraged. Within the 100-year flood plain of coastal waters, commercial development must meet the existing Federal Insurance Administration (Department of Housing and Urban Development) national building standards. Inclusion of buffer areas and protection of salt, brackish and freshwater wetlands will help absorb flood water surges and is encouraged in commercial development plans.	**Consistent**. The Alternative 1, 2, and 3 sites are not located within the 100-year flood plain.		
Chapter III, Section IV – Policy 1.d Drainage plans and construction measures for commercial development should be designed to lessen or eliminate erosion, water quality degradation and other negative impacts on adjacent waters and wetlands - for example, through buffering and filtering runoff water, use of naturally vegetated and permeable surfaces rather than paving, and grass-ditching and surface drainage rather than direct storm water discharges. Best management practices developed as part of the Areawide 208 Waste Treatment Management Program should be implemented through the management of major new commercial developments.	**Consistent.** The Proposed Action includes obtaining a National Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Construction Activities and implementing and maintaining permit-required BMPs to manage construction stormwater runoff. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan. The Proposed Action would include stormwater management systems including on-site stormwater detention basins to allow stormwater generated on-site to collect in the basin and gradually infiltrate into the soil to recharge the groundwater underlying the site.		
Chapter III, Section IV – Policy 1.e Adequate sewage disposal systems (septic tanks or treatment systems), meeting Federal Environmental Protection Agency, South Carolina Department of Health and Environmental Control, and local health department standards must be provided in new commercial development.	**Consistent.** The Proposed Action would be connected to the municipal sewage utility treatment system.		
Chapter III, Section IV – Policy 1.f Shorefront commercial development that disrupts existing public access will be prohibited. Developers of commercial property on the immediate beach or riverfront are strongly encouraged to provide such area for general public use in their plans.	**Consistent**. The proposed action is not located on beach or river-front areas and will not disrupt public access to the shore.		
Chapter III, Section IV – Policy 2 Any commercial activities and associated development which alter a critical area require a permit from South Carolina Department of Environmental Services. Commercial buildings and structures must meet the requirements of the Rules and Regulations for Permitting to obtain a permit.	**Consistent**. The Proposed Action is located within the critical area permitting boundary; the private entity would apply for and obtain a critical area permit from SCDES and will meet the prescribed requirements of the permit.		

3.5.2.2 Proposed Action – Alternative 1

3.5.2.2.1 Floodplains

The Alternative 1 conceptual plan shows the majority of the proposed OPC development would be located in the western portion of the site, outside of the FEMA-mapped flood hazard area. However, the eastern portion of the proposed parking lot and stormwater pond would be located in the 500-year floodplain. The specific acreage of development in the 500-year floodplain has not been determined for the conceptual plan.

While the current FEMA map indicates that the Alternative 1 site is not within a FEMA-mapped special flood hazard area, and therefore the Town of Port Royal Flood Damage Prevention Ordinance does not apply, the private entity would be required to check the FEMA map for updates. If the flood hazard areas have been revised and the site is now within a special flood hazard area, the private entity would comply with the Town of Port Royal Flood Damage Prevention Ordinance to protect the development from potential flood damage.

Therefore, construction and operation of the Proposed Action under Alternative 1 would have a permanent, negligible adverse impact associated with floodplains.

3.5.2.2.2 Wetlands

The Alternative 1 conceptual design shows most of the OPC development would be located in the western portion of the site, avoiding the majority of mapped wetlands. However, the conceptual plan shows a stormwater detention pond overlapping a portion of the W-2 wetland (palustrine scrub shrub wetland) in the northwestern portion of the site. The specific acreage of filling of the W-2 wetland has not been determined for conceptual plan.

Should the final design for Alternative 1 retain the need to fill a portion of the W-2 wetland, and the area to be filled is less than 0.5 acres, then the Proposed Action would be eligible for a Clean Water Act (CWA) *Nationwide Permit 39: Commercial and Institutional Developments* issued by USACE. The private entity would be responsible for applying for and obtaining the permit, as well as implementing any permit-required mitigation.

If the final design requires filling greater than 0.5 acres of wetlands, then the private entity would be required to apply for a Clean Water Act (CWA) Section 404 Individual Permit (IP) from USACE. A 12- to 18-month processing timeline is standard for obtaining a Section 404 IP from USACE. Concurrently with this process, a CWA Section 401 Water Quality Certification (WQC) review by the SCDES would occur as part of the joint federal/state review of Section 404 IP application. The private entity would be responsible for implementing any compensatory mitigation for unavoidable wetland impacts, as required by USACE and SCDES.

Should the final design entirely avoid filling wetlands, then a wetland permit and mitigation would not be required.

Therefore, the construction and operation of the Proposed Action at the Alternative 1 site would have a permanent, minor adverse impact on wetlands.

3.5.2.3 Proposed Action - Alternative 2

3.5.2.3.1 Floodplains

The Alternative 2 conceptual design plan shows the proposed OPC would be primarily located in the western and central portion of the site, which is not located in a FEMA-mapped flood hazard area. However, the eastern portion of a proposed stormwater management pond would be located in the 500-year floodplain.

Should the final design for the OPC development require development within the 500-year floodplain, then the private entity would comply with the City of Beaufort floodplain ordinance to ensure that the OPC development incorporates design elements to prevent flood damage and does not induce flooding elsewhere on- or off-site (City of Beaufort 2025).

Therefore, construction and operation of the Proposed Action under Alternative 2 would have a permanent, negligible adverse impact on floodplains.

3.5.2.3.2 Wetlands

The Alternative 2 conceptual design plan proposes filling the entire 0.38-acre wetland (W-1) located in the central part of the site to accommodate the OPC building and parking areas. Additionally, a portion of the eastern wetland (W-2) would be filled for a stormwater detention pond. The acreage of the fill required for the W-2 wetland has not been specified at the conceptual plan phase.

Should the final design for Alternative 2 retain the need to fill wetlands, and the area to be filled is less than 0.5 acres, then the Proposed Action would be eligible for a *Nationwide Permit 39: Commercial and Institutional Developments*. The private entity would be responsible for applying for and obtaining the permit, as well as implementing any permit-required mitigation.

If the final design requires filling greater than 0.5 acres of wetlands, then the private entity would be required to apply for a CWA Section 404 IP from USACE. A 12- to 18-month processing timeline is standard for obtaining a Section 404 IP from USACE. Concurrently with this process, a CWA Section 401 WQC review by the SCDES would occur as part of the joint federal/state review of Section 404 IP application. The private entity would be responsible for implementing any compensatory mitigation for unavoidable wetland impacts, as required by USACE and SCDES.

Therefore, the construction and operation of the Proposed Action at the Alternative 2 site would have a permanent, minor adverse impact on wetlands.

3.5.2.4 Proposed Action - Alternative 3

3.5.2.4.1 Floodplains

The Alternative 3 site is outside the 100- and 500-year floodplains and would have no impact on floodplains.

3.5.2.4.2 Wetlands

There are no wetlands located at the Alternative 3 site. Therefore, the Proposed Action at the Alternative 3 site would have no impact on wetlands.

3.5.2.5 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at any of the sites. Therefore, the No Action alternative would result in no impact on wetlands.

3.6 Cultural and Historic Resources

Cultural resources include both archaeologically significant elements and historic elements. The Archaeological Resources Protection Act prohibits the excavation of archaeological resources on federal lands. The National Historic Preservation Act (NHPA) of 1966, as amended, provides for the preservation of historic properties. Section 106 of the NHPA requires that federal agencies consider the impacts of their actions on such properties. Section 110 requires all federal agencies to assume responsibility for the preservation of historic properties under federal agency ownership or control.

3.6.1 Affected Environment

3.6.1.1 Proposed Action – Alternatives 1, 2, and 3

3.6.1.1.1 Initial Cultural Resource Impact Prediction Study

In February 2025, an Initial Cultural Resource Impact Prediction (ICRIP) study was performed at each of the Alternative 1, 2, and 3 sites to assess the potential impacts of the Proposed Action on the Area of Potential Effect (APE) in compliance with Section 106 of the National Historic Preservation Act (NHPA). The APE, as defined in 36 CFR 800.16(d), is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." The APE included 28.2 acres with a 250-foot buffer for Alternative 1; 16 acres with a 250-foot buffer for Alternative 2; and 10.56 acres with a 250-foot buffer for Alternative 3. All alternatives consider viewshed and other potential effects. The APE also included Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, SC, where VA currently operates a primary care clinic within Naval Hospital Beaufort. VA anticipates ceasing operations at this existing clinic and moving operations to the new OPC upon completion of its construction. Closure of this existing clinic would have no impact on other operations of Naval Hospital Beaufort.

The ICRIP incorporated the findings from Phase I archaeological surveys completed in December 2024 at the Alternative 1, 2, and 3 sites. The Phase I archaeological surveys were performed to assess the potential for finding precontact Native American and historic properties, as well as potential for cultural material related to former structures at each of the Alternative sites. All shovel tests completed were negative for cultural material.

The existing VA Beaufort Primary Care Clinic is located in the Naval Hospital Beaufort at 1 Pinckney Boulevard, Beaufort, SC. VA assumes that the Beaufort Naval Hospital is eligible for the National Register of Historic Places. Regardless of which Alternative site is selected, the existing VA clinic inside the Naval Hospital would be closed; VA has determined that closure of this clinic would have no effect to the operation of the hospital.

3.6.1.1.2 Section 106 Consultation

Based on the ICRIPs for Alternative 1, 2, and 3, VA determined that there are no known National Register of Historic Places listed or eligible properties within the APE. As a result, implementing the Proposed Action at the Alternative 1, 2, or 3 site would have no adverse effects to historic properties, pursuant to 36 CFR Part 800.5(b).

On May 5 and 6, 2025, VA initiated Section 106 consultation with the SC State Historic Preservation Office (SHPO); Beaufort County Historic Preservation Review Board (the Certified Local Government); Beaufort County Historical Society; and the five federally recognized Tribes with interests in Beaufort County, SC: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and Tuscarora Nation, as required under NHPA, Native American Graves Protection

and Repatriation Act, Executive Order (EO) 13007 Indian Sacred Sites, and EO 13175 Consultation and Coordination with Indian Tribal Governments. VA provided the Section 106 consultation parties with a copy of the ICRIP and Phase I archaeological survey and a written request for concurrence with VA's determination of finding that the Proposed Action would result in no adverse effects to historic properties, pursuant to 36 CFR Part 800.5(b).

On June 10, 2025, the SC SHPO informed VA that their Section 106 review is on-going. VA will incorporate the results of completed Section 106 consultation with the SC SHPO and consulting parties into the Final EA.

Copies of Section 106 consultation correspondence are included in Appendix C.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action – Alternatives 1, 2, and 3

As discussed in Section 3.6.1.1.2, VA concluded that the Proposed Action at the Alternative 1, 2, or 3 sites would result in no adverse effect to historic properties. The only historic property within the APE is the Beaufort Naval Hospital, however, when the existing VA clinic inside the Naval Hospital is closed and transferred to the new OPC, there will be no effect to the operations of the hospital. Therefore, construction and operation of the Proposed Action at the Alternative 1, 2, or 3 sites would have no impact on cultural and historic properties.

3.6.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at the site. Therefore, the No Action alternative would also result in no effect on cultural and historic resources.

3.7 Geology and Soils

The geology of an area includes surface and bedrock materials, its orientation and faulting, and geologic resources such as mineral deposits, petroleum reserves, and fossils. Soils refers to unconsolidated earthen materials overlaying bedrock or other parent material. Excavation, soil erosion, soil compaction, soil horizon removal, grading, and cutting and filling operations can result in a potential loss of soils and/or changes in geology.

3.7.1 Affected Environment

3.7.1.1 Proposed Action – Alternative 1, 2, and 3

3.7.1.1.1 Geology

The Alternative 1, 2, and 3 sites are located in Beaufort County, which is situated within the Atlantic Coastal Plain physiographic province, characterized by a gently sloping terrain composed of unconsolidated sediments that extend from the Fall Line to the Atlantic Ocean. This region's geological framework consists of a sequence of sedimentary formations ranging from the Cretaceous to the Quaternary periods (USGS 1936). The region's geomorphology has been significantly influenced by sea-level fluctuations, sediment deposition, and erosion processes over geological time scales. The subsurface geology of the Beaufort area includes several significant formations:

- **Peedee Formation (Late Cretaceous):** Comprising primarily gray to greenish-gray, fine- to medium-grained, glauconitic, fossiliferous sand and silt, this formation serves as a foundational unit in the region.

- **Beaufort Formation (Paleocene):** Overlying the Peedee Formation, the Beaufort Formation consists of gray argillaceous siltstone to fine-grained sandstone, often containing glauconite, mica, and pyrite. This unit is discontinuous and varies in thickness across the area.
- **Castle Hayne Formation (Eocene):** This formation is characterized by limestone and marl deposits, indicative of a shallow marine environment during its deposition.
- **Quaternary Deposits:** The surface layer consists of Holocene-age sediments, including sands, silts, clays, and organic-rich marsh deposits. These materials have been shaped by fluvial and tidal processes, contributing to the region's extensive marshlands and estuarine systems.

South Carolina, including the Beaufort region, is subject to low to moderate seismic risk. While the state has experienced significant seismic events historically, such as the 1886 Charleston earthquake, the Beaufort area is generally considered to have a lower seismic hazard compared to other parts of the state (SCDOT 2022).

3.7.1.2 Proposed Action – Alternative 1

3.7.1.2.1 Soils

Based on National Resource Conservation Service (NRCS) mapping, five soil types are present at the Alternative 1 site. The NRCS features for these soils are listed in Table 8 and depicted on Figure 15.

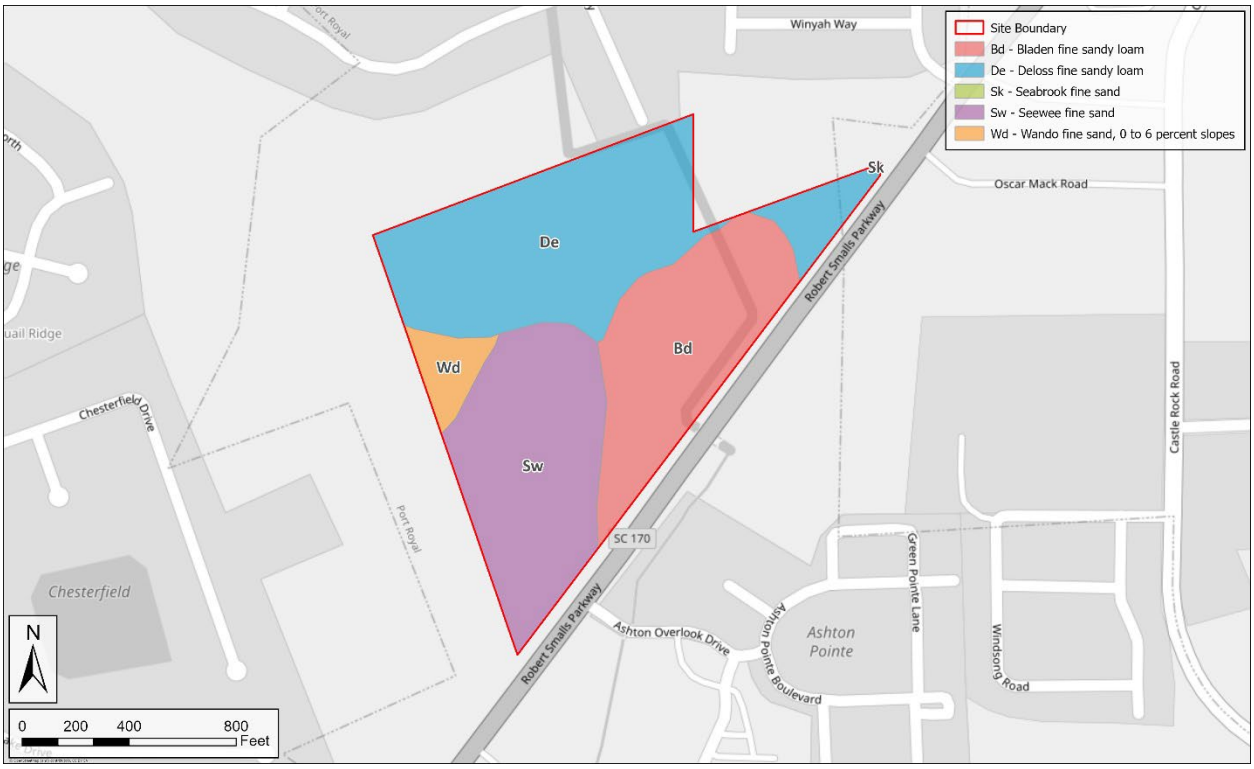
3.7.1.2.2 Prime Farmland

The Farmland Protection Policy Act requires federal agencies to assess the potential impact on agricultural land before approving a project that might convert prime farmland to non-agricultural use. As shown in Table 8, NRCS classifies three of the soils at the Alternative 1 site as prime farmland, if irrigated, and one soil as farmland of statewide importance. The Alternative 1 site is currently forested and is not used for agricultural production.

Table 8. Alternative 1 – NRCS Mapped Soil Characteristics

Soil Name (NRCS map ID)	Drainage Classification	Prime Farmland	Acres	Percent in Site
Bladen fine sandy loam (Bd)	Poorly drained	Farmland of statewide importance	7.3	26.1%
Deloss fine sandy loam (De)	Very poorly drained	Not prime farmland	11.3	40.7%
Seabrook fine sand (Sk)	Somewhat poorly drained	Prime farmland, if irrigated	0.01	0.01%
Seewee fine sand (Sw)	Somewhat poorly drained	Prime farmland, if irrigated	8.1	29.2%
Wando fine sand, 0 to 6 percent slopes (Wd)	Excessively drained	Prime farmland, if irrigated	1.1	4.0%

Figure 15. Alternative 1 - NRCS Mapped Soils



3.7.1.3 Proposed Action – Alternative 2

3.7.1.3.1 Soils

Based on NRCS mapping, two soil types are present at the Alternative 2 site. The NRCS features for these soils are listed in Table 9 and depicted on Figure 16.

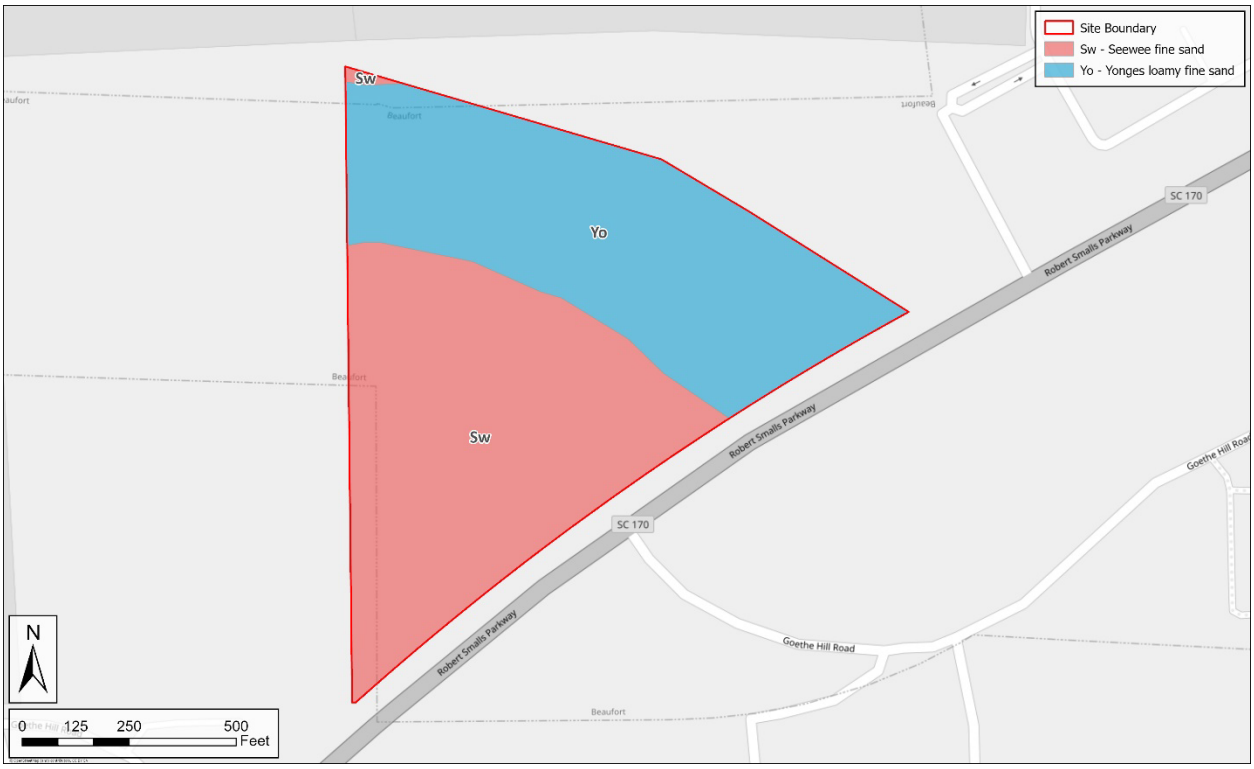
3.7.1.3.2 Prime Farmland

As shown in Table 9 and Figure 16, NRCS classifies one soil at the Alternative 2 site as prime farmland, if irrigated and drained, and the other as farmland of statewide importance. The Alternative 2 site is currently forested and is not used for agricultural production.

Table 9. Alternative 2 – NRCS Mapped Soil Characteristics

Soil Name (NRCS map ID)	Drainage Classification	Prime Farmland	Acres	Percent in Site
Seewee fine sand (Sw)	Somewhat poorly drained	Prime farmland, if irrigated	7.6	52.9%
Yonges loamy fine sand (Yo)	Poorly drained	Farmland of statewide importance	6.8	47.1%

Figure 16. Alternative 2 – NRCS Mapped Soils



3.7.1.4 Proposed Action – Alternative 3

3.7.1.4.1 Soils

Based on NRCS mapping, two soil types are present at the site. The NRCS features for these soils are listed in Table 10 and depicted on Figure 17.

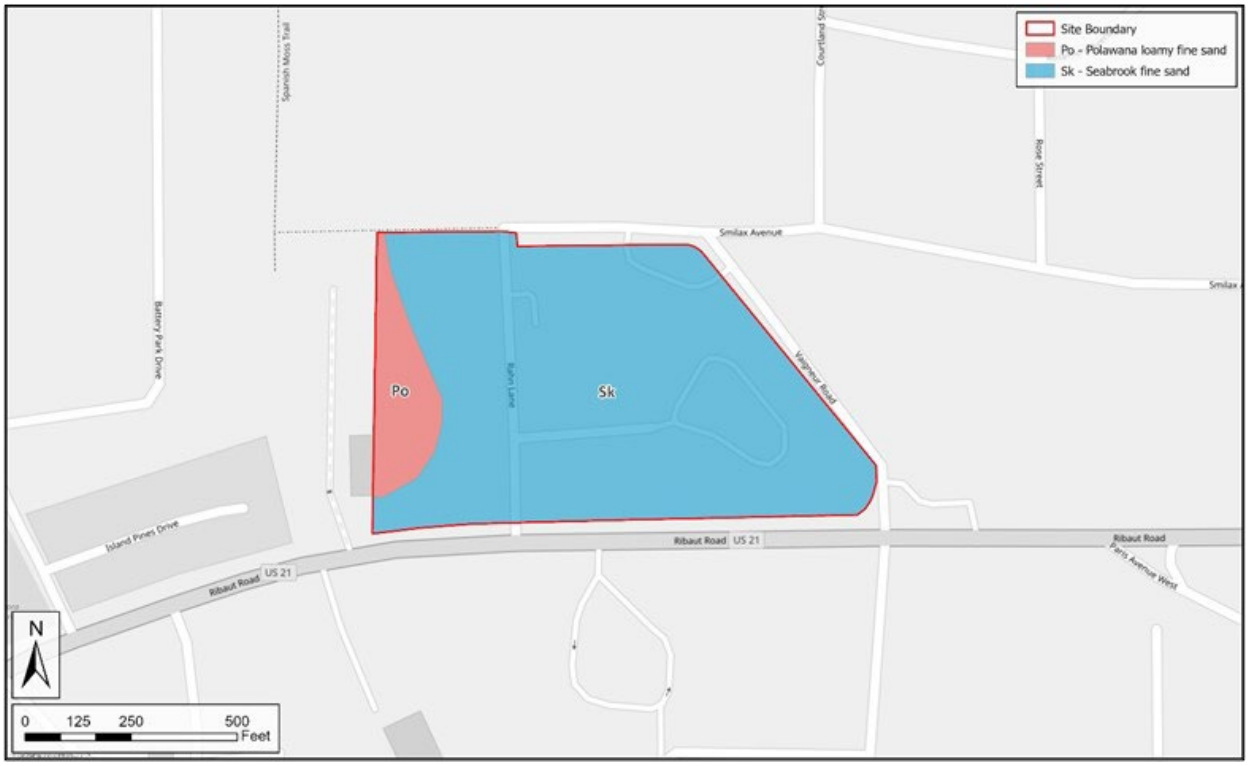
3.7.1.4.2 Prime Farmland

As shown in Table 10, NRCS classifies one soil at the Alternative 3 site as prime farmland, if irrigated and drained, and the other as prime farmland if irrigated. The Alternative 3 site is entirely developed and neither of these soils are currently under agricultural production.

Table 10. Alternative 3 – NRCS Mapped Soil Characteristics

Soil Name (NRCS map ID)	Drainage Classification	Prime Farmland	Acres	Percent in Site
Polawana loamy fine sand (Po)	Very poorly drained	Prime farmland, if irrigated and drained	1.0	9.1%
Seabrook fine sand (Sk)	Somewhat poorly drained	Prime farmland, if irrigated	9.9	90.9%

Figure 17. Alternative 3 – NRCS Mapped Soils



3.7.2 Environmental Consequences

3.7.2.1 Proposed Action – Alternative 1, 2, and 3

3.7.2.1.1 Construction

3.7.2.1.1.1 Geology

Construction activities at any one of the Alternative 1, 2, or 3 sites are not anticipated to contact bedrock. Therefore, the Proposed Action would have no impact on geological resources.

3.7.2.1.1.2 Soils

Under Alternative 1, 2, or 3, construction activities would require disturbing more than one acre of soil during land clearing and grading to prepare the site for the construction of the OPC and supporting infrastructure. This process would expose soils and make them susceptible to erosion by wind and surface runoff.

As a result, prior to construction, the private entity would apply for coverage under the SCDES National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities (SCDES 2024). The NPDES is a program under the CWA that controls water pollution by regulating point sources that discharge pollutants into waters of the United States, requiring permits for such discharges and is required for projects that disturb more than one acre of land. The NPDES program ensures that discharges meet specific standards and conditions to protect water quality. The NPDES General Permit application would include a Stormwater Pollution Prevention Plan that outlines the measures to be implemented and maintained to prevent stormwater runoff during the construction phase.

To minimize soil erosion and sedimentation of runoff during construction, the private entity would be responsible for implementing and maintaining the permit-required BMPs including those specified in SCDES *Water Regulations and Standards*: *Erosion and Sediment Reduction and Stormwater Management* (SCDES 1993), which include but are not limited to:

- Installing and maintaining sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic hay bales, rip-rap, and/or similar physical control structures.
- Retaining on-site vegetation to the maximum extent possible.
- Revegetating disturbed areas with native, non-invasive vegetation as soon as construction is completed.

During construction, the private entity would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) on soil quality. Releases of regulated quantities of petroleum-based fluids would be reported to VA and SCDES and cleaned up according to state regulatory requirements.

Therefore, the construction of the Proposed Action at any one of the Action Alternative 1, 2, or 3 sites would have a permanent, minor adverse impact on soil quality.

3.7.2.1.1.3 Prime Farmland

Under Alternatives 1, 2, or 3, development of the site would permanently and directly convert prime farmland soils to non-agricultural use. However, the Proposed Action has no mechanism to limit, restrict, or prevent access to other prime farmland soils in the area.

Therefore, construction of any one of the Alternatives 1, 2, or 3, would have a permanent, minor adverse impact on prime farmland soils at the site, but no impact on off-site prime farmland.

In accordance with the Farmland Protection Policy Act, VA completed the Farmland Conversion Impact Rating Form AD-1006. This form is used to assess whether the site is farmland subject to the Farmland Protection Policy Act. VA determined that neither Alternative 1, 2, or 3 would exceed the recommended allowable level based on each site's farmland conversion impact rating score determined by NRCS's land evaluation and site assessment system. A copy of USDA Form AD-1006 is included in Appendix B for NRCS review. Copies of correspondence with NRCS are included in Appendix B.

3.7.2.1.2 Operation

3.7.2.1.2.1 Geology

Under any one of the Alternatives 1, 2, or 3, operation of the Proposed Action would have no mechanism to impact bedrock.

3.7.2.1.2.2 Soils

Under any one of the Alternatives 1, 2, or 3, during operation, soils previously exposed during construction would be revegetated or covered with structures, asphalt/paving, or landscaping. The private entity would ensure that stormwater management facilities, which help to prevent soil erosion due to stormwater runoff, would function as designed for the duration of VA's lease.

Therefore, the operation of the Proposed Action at any one of the Alternative 1, 2, or 3 sites would have no impact on soils.

3.7.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on geology or soils.

3.8 Hydrology and Water Quality

Hydrology and water quality considerations relate to both surface water and groundwater and the impact of stormwater on both. Stormwater is surface water runoff generated from precipitation and has the potential to introduce sediments and other pollutants into surface waters. Impervious surfaces such as buildings, roads, parking lots, and even some natural soils increase surface runoff. Stormwater infrastructure includes the manufactured conveyance systems that function together with natural drainages to collect and control the rate of surface runoff during and after a precipitation event. In urbanized areas, stormwater that is not infiltrated into the ground or discharged to a waterbody may be conveyed to stormwater management systems which are designed to contain runoff on site during construction and to maintain predevelopment stormwater flow characteristics following development through either the application of infiltration or retention practices.

3.8.1 Affected Environment

Beaufort County is located on the lower Coastal Plain, with a significant portion of the area comprised of marshes and swamps (SCWRC 1989). The lower Coastal Plain slopes gently coastward, its altitudes ranging from more than 200 ft above sea level to sea level. The hydrogeology of Beaufort County is characterized by the Floridan aquifer as the primary source of groundwater, particularly its upper unit. The Floridan aquifer is a major source of groundwater supplies due to its high productivity and good water quality. The depth to groundwater in Beaufort varies by aquifer and location, generally ranging from approximately 4 to 14 feet below land surface in the surficial aquifer and from 4- to over 22-feet below land surface in the Floridan aquifer. These depths can change based on location in the landscape, tides, and precipitation (SCWRC 1989).

Beaufort County is located within the Salkehatchie River basin, in the southern Coastal Plain (SCDNR 2013). This hydrologic basin extends 95 miles inland from the Atlantic Ocean and also includes parts of Aiken, Allendale, Bamberg, Barnwell, Colleton, Hampton, and Jasper Counties. The major streams draining this mostly middle and lower Coastal Plain basin are the Salkehatchie River, Coosawhatchie River, and Ashepoo River. The Salkehatchie and Little Salkehatchie Rivers join to form the tidally-influenced Combahee River. The Coosawhatchie River discharges into the Broad River, a tidal saltwater river that also receives drainage from surrounding marshlands. The coastal area of this basin contains the most extensive estuarine water bodies in the State. These coastal water bodies are dominated by St. Helena Sound and Port Royal Sound and include numerous, often interconnecting, tidal creeks and rivers (SCDNR 2013).

Each of the Alternative 1, 2, and 3 sites are located in the Broad River/Port Royal Sound watershed (HUC 12 – 0305020806) (USGS 2025b) (SCDES 2024b). Watersheds, or drainage basins, are areas of land that drain into rivers or bodies of water. Broad River is a tidally-influenced system, often characterized by naturally low dissolved oxygen concentrations and pH levels. The majority of Broad River supports aquatic life and recreational uses.

3.8.1.1 Proposed Action – Alternative 1

3.8.1.1.1 Surface Water Features

As previously discussed in Section 3.5.1.2.2, the wetland and WOTUS survey at the Alternative 1 site identified one stream, a secondary unnamed tributary to the Broad River, in the central portion of the site and draining from north to south. No other surface water features were identified at the site.

3.8.1.1.2 Groundwater Characteristics

According to the USGS National Water Information System (NWIS), there is an inactive groundwater well (USGS Well Site ID 322413080461000) located approximately 0.4 miles west of the Alternative 1 site (USGS 2025b). The groundwater level was recorded at 23.08 feet below land in 1957; no other data was available for this well from USGS. A second inactive groundwater well (USGS Well Site ID 322427080461609) located approximately 0.6 miles northwest of the Alternative 1 site showed a single groundwater level at 18.6 feet below land in 2004; no other data was available for this well from USGS (USGS 2025b).

3.8.1.1.3 Stormwater Management and Drainage Patterns

The Alternative 1 site is undeveloped and lacks constructed stormwater management features. The site topography generally slopes east, and overland surface flow is anticipated to be toward the east following the slope. The majority of the Alternative 1 site is also located within a FEMA-mapped 500-year floodplain.

3.8.1.2 Proposed Action – Alternative 2

3.8.1.2.1 Surface Water Features

As previously discussed in Section 3.5.1.3.2, the wetland and WOTUS survey at the Alternative 2 site identified one stream, a secondary unnamed tributary to Battery Creek, that was present along the northeastern boundary of the site. No other surface water features were identified at the site.

3.8.1.2.2 Groundwater Characteristics

According to the USGS NWIS, there is an inactive groundwater well (USGS Well Site ID 322518080445909) located approximately 850 feet to the northwest of the Alternative 2 site (USGS 2025c). The groundwater level was recorded as ranging from 18.98 feet to 21.10 feet between 2004 and 2010.

3.8.1.2.3 Stormwater Management and Drainage Patterns

The Alternative 2 site is undeveloped and lacks constructed stormwater management features. The site topography generally slopes east, and overland surface flow is anticipated to be toward the east, following the slope, draining to the unnamed stream along the northeastern site boundary. The eastern portion of the site is also located within a FEMA-mapped 500-year floodplain.

3.8.1.3 Proposed Action – Alternative 3

3.8.1.3.1 Surface Water Features

There are no surface water features at the Alternative 3 site. The nearest surface water body is Battery Creek, located approximately 1,000 feet west of the site.

3.8.1.3.2 Groundwater Characteristics

According to the USGS NWIS, there is an inactive groundwater well (USGS Well Site ID 322309080415500) located approximately 150 feet to the northeast of the Alternative 3 site (USGS 2025b). The groundwater level was recorded at 22.91 feet in 1992; no other data for this well was available from USGS.

3.8.1.3.3 Stormwater Management and Drainage Patterns

The Alternative 3 site slopes to the south. Stormwater generated at the site may evaporate and percolate into the soil in the pervious portions of the site, or flow into the roadside stormwater management system along Ribaut Road. The Alternative 3 site is not within a FEMA-mapped 100- or 500-year floodplain.

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action – Alternatives 1, 2, and 3

3.8.2.1.1 Construction

Construction of the Proposed Action at any one of the Action Alternatives 1, 2, or 3, would alter existing site conditions, increasing impervious area, and potentially impacting hydrology and water quality. Key concerns include increased surface runoff due to an increase in the area of impervious surfaces and changes to the on-site drainage patterns. See Table 2 for each design's added impervious surface.

The conceptual development plans under Alternatives 1, 2, and 3, do not propose significant modifications to the existing topography at any of the sites. However, construction activities would include site clearing and grading, followed by constructing the OPC building, parking lots, and access roads, which would increase impervious surface areas at the site. Grading and site reconfiguration may disrupt existing drainage patterns, potentially leading to ponding in low-lying areas, or allow stormwater to flow offsite.

To minimize adverse impacts to hydrologic and water quality conditions from construction activities, the private entity would obtain an SCDES NPDES General Permit for Stormwater Discharges from Construction Activities and implement and maintain permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure (SPCC) plan and train workers on how to respond to accidental releases of petroleum-based fluids to prevent impacts to groundwater.

Increasing impervious areas could permanently impact hydrology by reducing stormwater infiltration and groundwater recharge. To minimize this impact, the conceptual designs for each Alternative include constructing on-site stormwater detention basins that would allow stormwater generated on-site to collect in the basin and gradually infiltrate into the soil and recharge the groundwater underlying the basin.

Therefore, construction of the Proposed Action at any one of the Alternative 1, 2, or 3 sites would have a permanent, negligible adverse impact on hydrology and water quality.

3.8.2.1.2 Operation

Under Alternative 1, 2, or 3, stormwater generated during operation could contain oils, grease, heavy metals, and other contaminants as it flows over paved parking areas at the site.

To reduce contaminant levels and prevent off-site migration of stormwater, the conceptual development plan for all alternatives includes on-site stormwater detention basins designed to capture stormwater generated at the site and infiltrate it into the ground over time. The private entity would maintain these stormwater management facilities to ensure they function as designed. The stormwater management systems may include oil-water separators in parking lot drainage systems to capture petroleum-based fluids and other contaminants; design and maintain infiltration systems with liners or pre-treatment measures to mitigate the risk of contaminant migration into groundwater; and install and maintain advanced stormwater controls, such as rain gardens and permeable pavement, to further increase stormwater infiltration on-site.

Therefore, the operation of the Proposed Action would have a permanent, negligible adverse impact on hydrology and water quality.

3.8.2.2 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on hydrology and water quality.

3.9 Land Use

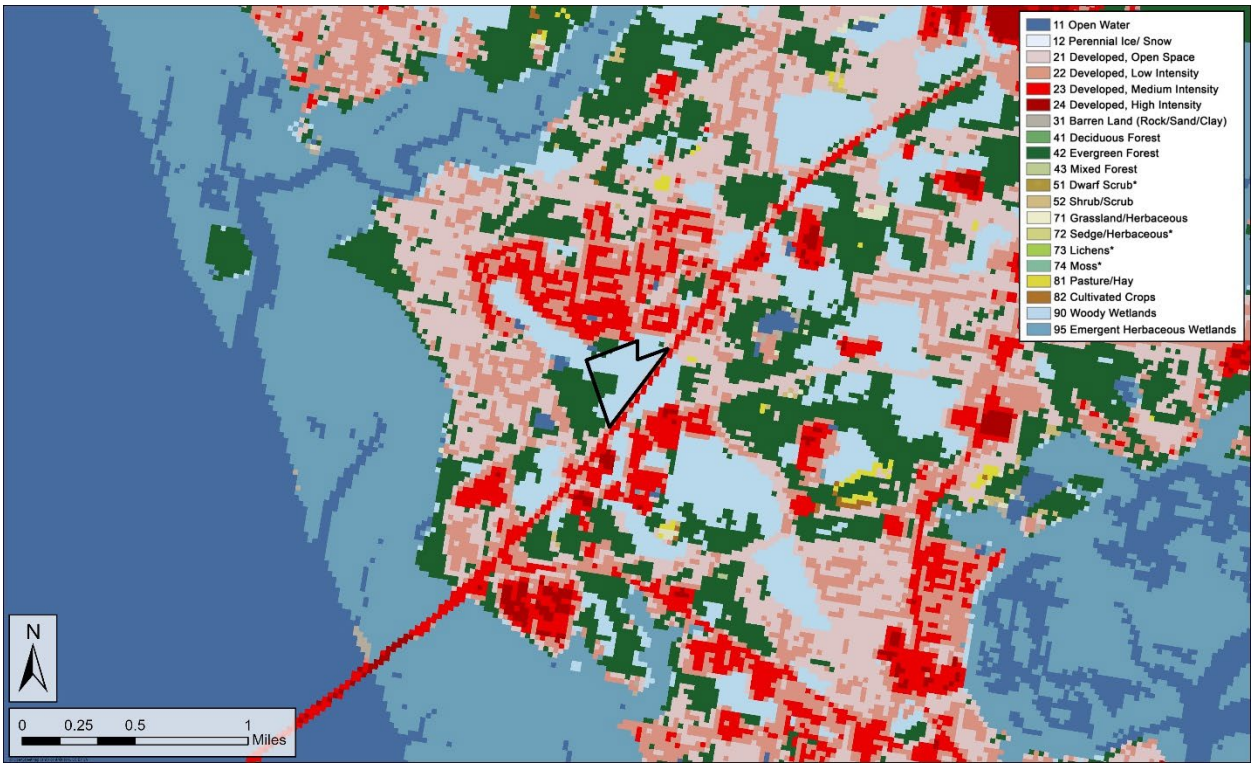
Considerations related to land use help to provide insights into existing land use patterns, identify potential conflicts, and inform decisions related to zoning and infrastructure planning.

3.9.1 Affected Environment

3.9.1.1 Proposed Action – Alternative 1

The Alternative 1 site is identified on the Beaufort County Online Geographic Information Systems (GIS) website zoning map as 708 Robert Smalls Parkway, within the municipal limits of the Town of Port Royal, and in the "T4 Neighborhood Center Open" (T4NCO) zoning district. The Town of Port Royal defines the T4NCO zoning district as an area designed to provide neighborhoods with a broader amount of retail and service uses (Port Royal 2024). The surrounding land use is primarily residential, consisting of single-family homes and apartments, with commercial properties interspersed. Land use in the general area varies from low to high intensity, as shown on the land use cover map in Figure 18.

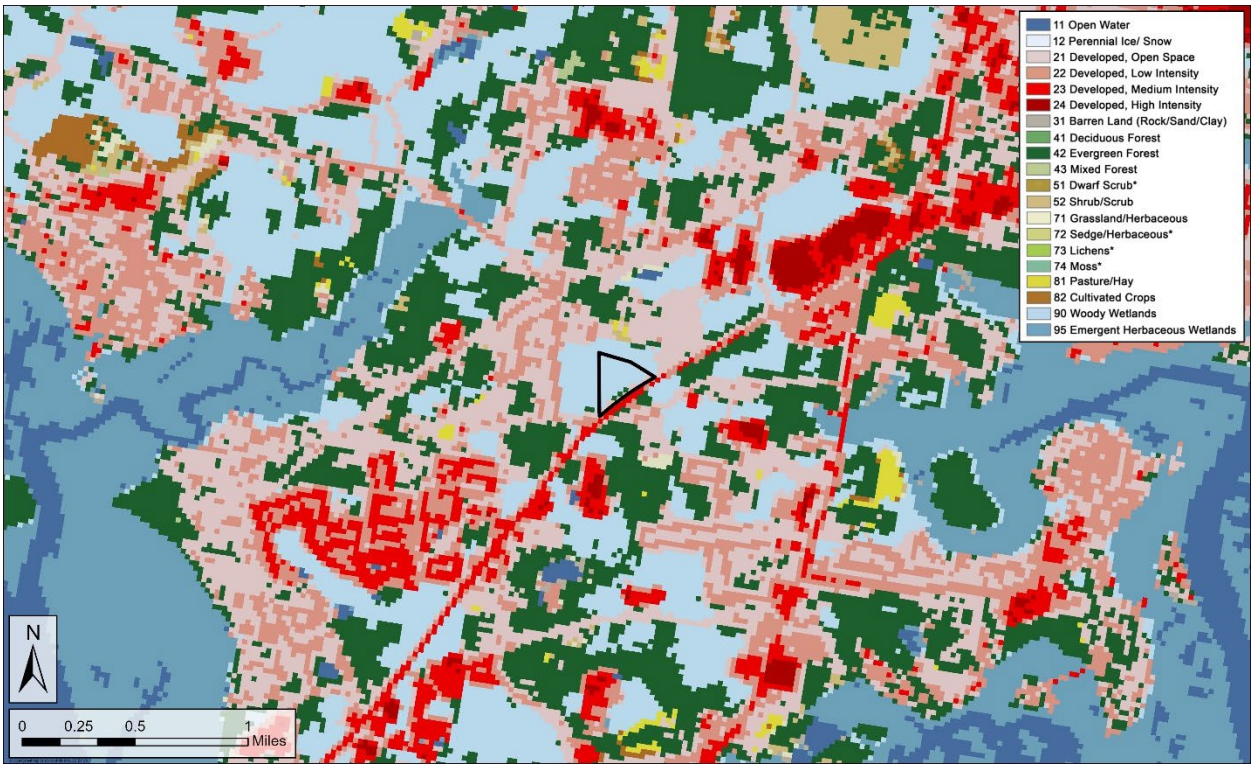
Figure 18. Alternative 1 – Land Use Cover Map



3.9.1.2 Proposed Action - Alternative 2

The Alternative 2 site is located at Robert Smalls Parkway and Goethe Hill Road, north of the intersection with Goethe Hill Road, and identified on the Beaufort County Online GIS website zoning map as part of a larger parcel identified as 301 Robert Smalls Parkway, within the municipal limits of the City of Beaufort, and in the Institutional & Campus district. The City of Beaufort defines the Institutional & Campus district as supporting generally non-residential institutions and employment areas that are designed in a campus-like setting, such as hospitals, universities, research facilities, and offices. Surrounding land use is predominantly residential with single family homes and apartments, with commercial properties interspersed. Land use in the general area varies from low to medium intensity, as shown on the land use cover map in Figure 19.

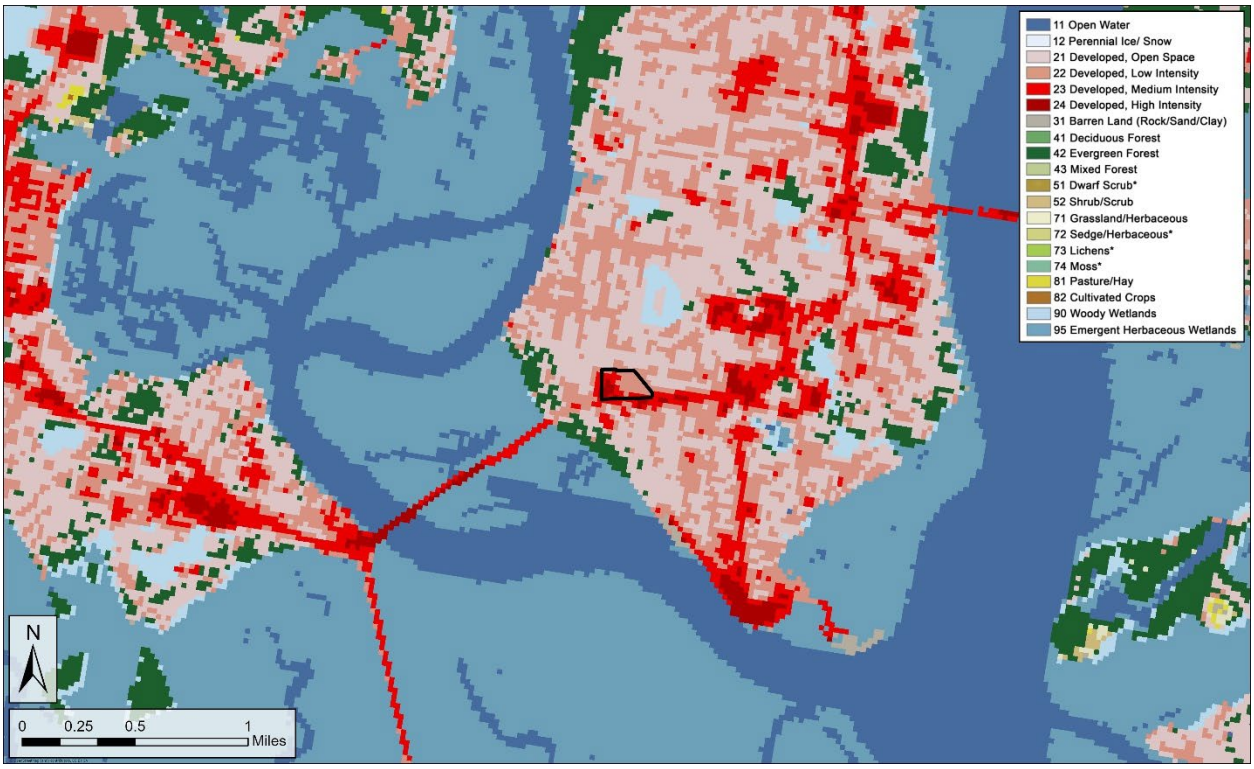
Figure 19. Alternative 2 – Land Use Cover Map



3.9.1.3 Proposed Action - Alternative 3

The Alternative 3 site is identified on the Beaufort County Online GIS website zoning map as 1830 and 1844 Ribaut Road and 1807 Rahn Lane, within the municipal limits of the Town of Port Royal, and in the Town of Port Royal "T5 Main Street" zoning district. This T5 Main Street Zone consists of higher density, mixed-use buildings that accommodate retail, rowhouses, offices, and apartments along primary thoroughfares within a neighborhood framework. A tight network of streets defines this Zone as a highly walkable area. Buildings are set very close to the frontages in order to define the public realm. Surrounding land use is predominantly residential with single family homes and apartments, with some commercial and light industrial properties interspersed. Land use in the general area varies from low to medium intensity, with higher intensity land use concentrated along Ribaut Road, as shown on the land use cover map in Figure 20.

Figure 20. Alternative 3 – Land Use Cover Map



3.9.2 Environmental Consequences

3.9.2.1 Proposed Action – Alternatives 1, 2, and 3

The construction and operation of the OPC under Alternatives 1 and 3, which are located in the Town of Port Royal, would be consistent with the Town of Port Royal zoning and the Port Royal 2030 Comprehensive Plan (Town of Port Royal 2021). Alternative 2, which is located in the City of Beaufort, would be consistent with the City of Beaufort zoning and the Beaufort County 2040 Comprehensive Plan (Beaufort County 2024). Under Alternative 1, 2, or 3, the Proposed Action would not restrict land uses at properties adjacent to or in the vicinity of the site.

Therefore, construction and operation of the Proposed Action under Alternatives 1, 2, or 3 would have no impact on land use.

3.9.2.2 No Action

Under the No Action alternative, there would be no change to existing conditions and no impact on land use. The site could be developed by other parties for other uses in the future.

3.10 Noise and Vibration

3.10.1 Noise

Noise is generally defined as an unwanted sound that interferes with or disrupts normal human activities. Sound is most commonly measured in decibels (dB). Daytime noise levels of 40 dB are generally perceived as quiet, 60 dB as moderate, and greater than 70 dB as loud. The Noise Pollution and Abatement Act of 1972 initiated a federal program of regulating noise pollution with the intent of protecting human health and minimizing annoyance of noise to the public.

Sensitive noise receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. Hospitals, schools, convalescent facilities, religious institutions, libraries, recreation areas, and residential areas are considered to be sensitive receptors, particularly when located within 0.25 miles of the noise source.

3.10.1.1 Construction Noise

Construction noise levels vary depending on the type of equipment being used, the duration of use, and the receptor's distance from the source. Table 11 details the predicted noise levels (at a distance of 50 feet from the source) for common construction equipment (FTA 2018). The sound levels experienced by human receptors would vary depending on distance from the noise source and decrease approximately 6 decibels (reported as dBA) with every doubling of distance. Common sound levels are shown in Table 12 (OSHA 2022).

Table 11. Predicted Noise Levels for Construction Equipment

Construction Equipment	Predicted Noise Level at 50 feet (dBA)
Concrete Saw	90
Jackhammer	89
Grader	85
Trailer/Loader/Backhoe	84
Roller	80
Crane	81
Paver	77
Dump Truck	76

Table 12. Common Sound Levels

Source	Decibel Level (dBA)
Silent Study Room	20
North Rim of Grand Canyon	30
Soft Whisper (5 ft. away)	40
Urban Residence	50
Conversation (3 ft. away)	60
Classroom Chatter	70
Freight Train (100 ft. away)	80
Boiler Room	90
Construction Site	90-100
Night Club (with music)	110
Operating Heavy Equipment	120
Jet Taking Off (200 ft. away)	130
Threshold of Pain	140

3.10.1.2 Municipal Noise Ordinances

The Town of Port Royal prohibits excessive noise between 10 p.m. and 7 a.m. (Town of Port Royal 2011). These restrictions apply to Alternatives 1 and 3. The City of Beaufort prohibits loud noises, such as construction equipment, from operating between 9 p.m. and 8 a.m. (City of Beaufort 2015). These restrictions apply to Alternative 2.

3.10.1.3 U.S. Occupational Safety and Health Administration

The U.S. Occupational Safety and Health Administration (OSHA) requires employers to implement a hearing conservation program when noise exposure is at or above 85 decibels averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average. The construction contractor would provide hearing protection to all workers who may be exposed to these noise levels.

3.10.2 Vibration

Vibration refers to the oscillatory motion of particles in a medium, often caused by mechanical forces. Vibration decibels (VdB) are used to measure vibration because they correspond well to how humans respond to environmental vibrations. The background vibration velocity level in residential areas is usually 50 VdB or lower and the threshold of perception for humans is approximately 65 VdB. A vibration level of 85 VdB in a residence can result in strong annoyance (FTA 2018). Sensitive receptors for vibration are the same as sensitive receptors for noise.

3.10.3 Affected Environment

3.10.3.1 Proposed Action - Alternative 1

The current soundscape and vibration conditions at the Alternative 1 site reflect those typical of a suburban environment. The site is presently forested and lacks any sources of noise generation. Noises surrounding the site are predominantly from vehicles traveling on Robert Smalls Parkway, which is adjacent to the southern boundary of the site. The nearest sensitive receptors to the site are residences on Seneca Way, Keowee Lane and Winyah Way. The nearest residence is situated on Seneca Way, approximately 25 feet north of the Alternative 1 site boundary. However, the Alternative 1 conceptual plan aligns the OPC development in the western portion of the site, where the nearest receptor is the apartment complex on Ashton Overlook Drive, approximately 450 feet south of the site and south of Robert Smalls Parkway.

3.10.3.2 Proposed Action - Alternative 2

The current soundscape and vibration conditions at the Alternative 2 site reflect those typical of a suburban environment. The site is presently forested and lacks any sources of noise generation. Noises surrounding the site are predominantly from vehicles traveling on Robert Smalls Parkway, which is adjacent to the southern boundary of the site. The soundscape is influenced by vehicles traveling on Robert Smalls Parkway and Goethe Hill Road. The nearest sensitive receptors are residences on Walker Circle, Colonial Avenue and Goethe Hill Road. The nearest residential receptor is an isolated home located on Goethe Hill Road, approximately 50 feet to the west of the Alternative 2 site boundary. The next nearest receptors are the residences located on Walker Circle, approximately 400 northwest of the site. The Bridges Preparatory School is located approximately 920 feet south of the site. Construction noise generated at the southern portion of the site would decrease to approximately 65-75 dBA at this school. No other noise and vibration sensitive receptors are located within 0.25 miles of the site.

3.10.3.3 Proposed Action - Alternative 3

The current soundscape and vibration conditions at the Alternative 3 site reflect those typical of a mixed commercial and suburban environment. The site is entirely developed with a commercial warehouse and landscaping business and a former apartment complex. The commercial warehouse generates noises from vehicles and equipment traveling to and from the warehouse. The apartment complex is not in use and does not generate noise. Noises surrounding the site are predominantly from vehicles traveling on Ribaut Road, Smilax Avenue, Rahn Lane, and Vaigneur Road, which are adjacent to the site. The nearest sensitive receptors are residences located along Smilax Avenue and Vaigneur Road, approximately 40 feet from the

Alternative 3 site boundary. Lenora Park is located approximately 750 feet west of the site. Construction noise generated at the southern portion of the site would decrease to approximately 66-76 dBA at this school. The Arthur Horne Nature Park is located approximately 930 feet northeast of the site. Construction noise generated at the southern portion of the site would decrease to approximately 65-75 dBA at this school. The Port Royal United Methodist church is located approximately 1,300 feet southeast of the site. Construction noise generated at the southern portion of the site would decrease to approximately 62-72 dBA at this school. No other noise and vibration sensitive receptors are located within 0.25 miles of the site.

3.10.4 Environmental Consequences

3.10.4.1 Proposed Action - Alternative 1

3.10.4.1.1 Construction Noise

Under Alternative 1, construction activities would generate noise from equipment used during site clearing and grading, followed by construction of the OPC building and infrastructure. Typical construction equipment would include excavators, cranes, backhoe-loaders, welders, aerial lifts, graders, pavers/paving equipment, rollers, haul trucks, and concrete mixing trucks, though this equipment would only be in use at the site when the specific function it is designed for is needed.

Construction activities along the site border would be associated with land clearing, grading, and paving. The nearest residential receptors to these noise generating activities are located at the apartment complex located on Ashton Overlook Drive, approximately 450 feet south of the site and south of Robert Smalls Parkway. These construction noises would range from approximately 90-100 dBA and would be reduced to approximately 70-80 dBA at a distance of 450 feet. The noise level would decrease further as construction activities move toward the interior of the site, away from the residential receptors. Noise from vehicles traveling on Robert Smalls Parkway would continue to dominate the soundscape at the apartment complex.

The private entity for the Alternative 1 site would comply with the Town of Port Royal noise ordinance and the OSHA worker hearing conservation program.

The private entity would implement BMPs for noise control if necessary and to an extent technically practicable. These noise BMPs could include:

- Using shields or other physical barriers to restrict noise transmission.
- Providing soundproof housings or enclosures for noise producing machinery.
- Using efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below the noise levels specified.
- Conducting truck loading, unloading, and hauling operations so that noise is kept to a minimum.
- Selecting material transportation routes as far away from sensitive receptors as possible.
- Shutting down noise-generating heavy equipment when not in use.

Therefore, construction of the Proposed Action at the Alternative 1 site would result in a temporary, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.1.2 Operation Noise

Operation of the Proposed Action at the Alternative 1 site would create noises and noise levels typical of a medical facility. Noises would be primarily generated from vehicles traveling to and from the OPC from Robert Smalls Parkway. Noises would also be generated from operating the heating, ventilation, and air conditioning system and monthly testing of the emergency generators. The soundscape at adjacent properties would continue to be dominated by vehicles traveling on Robert Smalls Parkway.

Therefore, the operation of the Proposed Action at the Alternative 1 site would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.1.3 Construction Vibration

There would be no demolition as part of the Proposed Action at the Alternative 1 site. Should pile driving be required to help shore the ground and support the OPC building, the private entity construction contractor would implement all necessary precautions to reduce the potential for vibration impact to the nearby residences.

Therefore, construction of Proposed Action at the Alternative 1 site would have a temporary, negligible adverse impact on vibration-sensitive receptors.

3.10.4.1.4 Operation Vibration

Operation of the Proposed Action at the Alternative 1 site has no mechanism to generate vibrations that would extend off-site to affect the surrounding community.

Therefore, the operation of the Proposed Action would have no impact on vibration-sensitive receptors.

3.10.4.2 Proposed Action - Alternative 2

3.10.4.2.1 Construction Noise

Under Alternative 2, construction activities would generate noise from equipment used during site clearing and grading, followed by construction of the OPC building and infrastructure. Typical construction equipment would include excavators, cranes, backhoe-loaders, welders, aerial lifts, graders, pavers/paving equipment, rollers, haul trucks, and concrete mixing trucks, though this equipment would only be in use at the site when the specific function it is designed for is needed.

Construction activities along the site border would be associated with land clearing, grading, and paving. The nearest sensitive receptors are residences on Walker Circle, Colonial Avenue and Goethe Hill Road. The nearest residential receptor is a residence located on Goethe Hill Road, approximately 50 feet to the west of the Alternative 2 site boundary. Construction noises at approximately 90-100 dBA would be reduced to approximately 84-94 dBA at a distance of 50 feet. The next nearest receptors are the residences located on Walker Circle, approximately 400 northwest of the site, with other residential neighborhoods to the west and east at 450-700 feet away. Construction noises would decrease to approximately 72-82 dBA at a distance of 400 feet and decrease to 67-80 dBA at 450-700 feet. The noise level would decrease further as construction activities move toward the interior of the site, away from the residential receptors. Noise from vehicle travel would continue to dominate the soundscape at residences to the west, north, and east of the site.

The private entity for the Alternative 2 site would comply with the City of Beaufort noise ordinance and the OSHA worker hearing conservation program. The private entity would also implement the BMPs described for Alternative 1 under Section 3.10.4.1.1.1.

Therefore, construction of the Proposed Action at the Alternative 2 site would result in a temporary, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.2.2 Operation Noise

Operation of the Proposed Action at the Alternative 2 site would create noises and noise levels typical of a medical facility. Noises would be primarily generated from vehicles traveling to and from the OPC from Robert Smalls Parkway. Noises would also be generated from operating the heating, ventilation, and air conditioning system and monthly testing of the emergency generators. The soundscape at adjacent properties would continue to be dominated by vehicles traveling on Robert Smalls Parkway to the south, as well as vehicle travel throughout the residential neighborhoods to the west, north, and east of the site.

Therefore, the operation of the Proposed Action at the Alternative 2 site would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.2.3 Construction Vibration

There would be no demolition as part of the Proposed Action at the Alternative 2 site. Should pile driving be required to help shore the ground and support the OPC building, the private entity construction contractor would implement all necessary precautions to reduce the potential for vibration impact to the nearby residences.

Therefore, construction of Proposed Action at the Alternative 2 site would have a temporary, negligible adverse impact on vibration-sensitive receptors.

3.10.4.2.4 Operation Vibration

Operation of the Proposed Action at the Alternative 2 site has no mechanism to generate vibrations that would extend off-site to affect the surrounding community.

Therefore, the operation of the Proposed Action would have no impact on vibration-sensitive receptors.

3.10.4.3 Proposed Action - Alternative 3

3.10.4.3.1 Construction Noise

Under Alternative 3, construction activities would generate noise from equipment used to demolish the existing buildings at the site, followed by grading and construction of the OPC building and infrastructure. Typical construction equipment would include excavators, cranes, backhoe-loaders, welders, aerial lifts, graders, pavers/paving equipment, rollers, haul trucks, and concrete mixing trucks, though this equipment would only be in use at the site when the specific function it is designed for is needed.

The Alternative 3 site is abutted by both commercial and residential properties and Ribaut Road. The nearest sensitive receptors are residences on Vaigneur Road and Smilax Avenue and approximately 40 feet from the site. As a result, construction activities along the site perimeter at noise levels ranging from 90-100 dBA would be approximately 85-95 dBA at 40 feet away. The noise level would decrease further as construction activities move toward the interior of the site, away from the residential receptors. Noise from vehicle travel, primarily on Ribaut Road, would continue to dominate the soundscape at the site and in the surrounding community. Noise from vehicle travel on Vaigneur Road and Smilax Avenue would be audible to residential receptors abutting those roadways.

The private entity for the Alternative 3 site would comply with the Town of Port Royal noise ordinance and the OSHA worker hearing conservation program. The private entity would also implement the BMPs described for Alternative 1 under Section 3.10.4.1.1.1.

Therefore, due to the proximity of the site to the nearest residential abutters, construction of the Proposed Action at the Alternative 3 site would result in a temporary, minor adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.3.2 Operation Noise

Operation of the Proposed Action at the Alternative 3 site would create noises and noise levels typical of a medical facility. Noises would be primarily generated by vehicles traveling to and from the OPC from Ribaut Road. Noises would also be generated from operating the heating, ventilation, and air conditioning system and monthly testing of the emergency generators. The soundscape at adjacent properties would continue to be dominated by vehicles traveling on Ribaut Road to the south, as well as vehicle travel throughout the residential neighborhoods on Vaigneur Road and Smilax Avenue.

Therefore, operation of the Proposed Action at the Alternative 3 site would have a permanent, negligible adverse impact on noise-sensitive receptors in the surrounding community.

3.10.4.3.3 Construction Vibration

Construction of the Proposed Action at the Alternative 3 site would require the demolition of the commercial warehouse, apartment buildings, and pavements. These activities would require the use of excavators, dozers, and supporting construction equipment. It is possible that demolition of the foundation would require the temporary use of typical jackhammering equipment to break the foundation for excavation and off-site disposal. Following grading, tampers may be needed to compact the soil to make it suitable for development. This work would temporarily increase vibration levels at the site.

Construction would cause various degrees of ground vibration, depending on the equipment, methods employed, and soil compactness, but the vibrations diminish in strength with distance (Hanson 2006). Typical vibration levels from construction equipment at a reference distance of 25 feet are: 104 VdB for an impact pile driver; 87 VdB for a bulldozer; 86 VdB for a loaded truck; and 79 VdB for a jackhammer. At a distance of 75 feet from these sources, the estimated vibration levels would be expected to be below the strong annoyance criterion of 85 VdB (FTA 2018). At the Alternative 3 site, the foundations that could require jackhammering are located approximately 85 feet from the nearest sensitive receptor.

Potential construction-period vibration impacts would be assessed during the final design phase, when construction methods and the locations of specific types of construction equipment have been identified. Measures for reducing vibration impact to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.

Therefore, construction of the Proposed Action at the Alternative 3 site would have a temporary, minor adverse impact on vibration-sensitive receptors.

3.10.4.3.4 Operation Vibration

Operation of the Proposed Action at the Alternative 2 site has no mechanism to generate vibrations that would extend off-site to affect the surrounding community.

Therefore, the operation of the Proposed Action would have no impact on vibration-sensitive receptors.

3.10.4.4 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions. Therefore, the No Action alternative would result in no impact on noise and vibration.

3.11 Solid Waste and Hazardous Materials

Hazardous materials include, but are not limited to, hazardous and toxic substances and waste, and any materials that pose a potential hazard to human health and the environment due to their quantity,

concentration, or physical and chemical properties. Hazardous wastes are characterized by their ignitability, corrosivity, reactivity, and toxicity. Hazardous materials and wastes, if not controlled, may either (1) cause or significantly contribute to an increase in mortality, serious irreversible illness, or incapacitating reversible illness; or (2) pose a substantial threat to human health or the environment.

3.11.1 Affected Environment

3.11.1.1 Proposed Action - Alternative 1

A Phase I ESA report for the Alternative 1 site was completed in July 2023. The Phase I ESA was completed in accordance with ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, and USEPA Standards and Practices for All Appropriate Inquiries contained in 40 CFR Part 312. The assessment revealed no evidence of Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), Controlled Recognized Environmental Conditions (CRECs), or Significant Data Gaps (SDGs) at the Alternative 1 site.

3.11.1.2 Proposed Action - Alternative 2

A Phase I ESA report for the Alternative 2 site was completed in August 2023. The Phase I ESA was completed in accordance with ASTM E1527-21 and USEPA 40 CFR Part 312. The assessment revealed no evidence of RECs, HRECs, CRECs, SDGs, or Business Environmental Risks (BERs) at the Alternative 2 site.

3.11.1.3 Proposed Action - Alternative 3

A Phase I ESA report for the Alternative 3 site was completed in August 2023. The Phase I ESA was completed in accordance with ASTM E1527-21 and USEPA 40 CFR Part 312. The assessment revealed no evidence of RECs, CRECs, or SDGs at the Alternative 3 site. However, the Phase I ESA stated that due to the age of the buildings (pre-1989), asbestos-containing materials (ACMs) are likely present and appear in good condition. Material samples need to be collected to confirm the presence of ACMs. Similarly, given the property's age (pre-1978), lead-based paints (LBPs) are likely present on the buildings. All painted surfaces appear in good condition, but material samples must be collected to confirm the presence of LBP.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action – Alternatives 1 and 2

3.11.2.1.1 Construction

Construction of the Proposed Action at the Alternative 1 or 2 sites would generate vegetative and material debris and excess soils during land clearing and grading. The private entity would be required to recycle or reuse materials to the maximum extent practicable or dispose of them at USEPA-approved facilities. Only materials that cannot be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. All soil removed that cannot be reused on site would be transported to an appropriate landfill for reuse as fill or daily cover. The private entity would be responsible for the proper management and disposal of all construction wastes.

Therefore, the construction of the Proposed Action at the Proposed Action Alternative 1 or 2 sites would have a temporary, minor adverse impact on solid waste by temporarily increasing the volume of construction-related debris disposed of at an off-site landfill.

3.11.2.2 Proposed Action – Alternative 3

3.11.2.2.1 Construction

Construction of the Proposed Action at the Alternative 3 site would generate construction and demolition debris from the commercial warehouse and apartment buildings, as well as minimal vegetative debris and excess soils during land clearing and grading.

Prior to demolition of the buildings, the private entity would be responsible for assessing the buildings for ACM in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and SCDES Regulation 61-86.1 (Standards for Performance for Asbestos Projects).

The disturbance of LBP is regulated by OSHA and the National Emission Standards for Hazardous Air Pollutants statute for general dust control. The disposal of commercial waste materials containing lead from rehabilitation, abatement, and/or demolition is regulated by the Resource Conservation and Recovery Act (RCRA). Accordingly, the private entity would be responsible for assessing the buildings for LBP and determining the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA.

For all other debris, the private entity would be required to recycle or reuse materials to the maximum extent practicable or dispose of them. Only materials that cannot be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. All soil removed that cannot be reused on site would be transported to an appropriate landfill for reuse as fill or daily cover. The private entity would be responsible for the proper management and disposal of all other construction wastes.

Therefore, the construction of the Proposed Action at the Proposed Action Alternative 3 site would have a temporary, minor adverse impact on solid waste by temporarily increasing the volume of construction-related debris disposed of at an off-site landfill.

3.11.2.3 Proposed Action – Alternatives 1, 2, and 3

3.11.2.3.1 Operation

Consistent with existing VA OPC operational practices, the OPC would use a variety of small quantities of chemicals for diagnostics and treatments. Hazardous wastes may consist of chemical, low-level radiopharmaceutical, and medical wastes. Janitorial and landscaping maintenance activities include the use of cleaners, solvents, degreasers, and paints. Other non-hazardous materials used during OPC operations include diesel fuel for the emergency generators, lubricants, and oils.

The OPC would not have an on-site solid waste management facility. Solid wastes generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility.

Therefore, the operation of the Proposed Action at any one of the Alternative 1, 2, or 3 sites would have a permanent, negligible adverse impact on solid waste and hazardous materials associated with routine operation of an OPC.

3.11.2.4 No Action Alternative

Under the No Action alternative, there would be no change to existing conditions at any of the sites. Therefore, the No Action alternative would result in no impact on solid waste and hazardous materials.

3.12 Traffic, Transportation, and Parking

Transportation and parking refer to the movement and parking of people, goods, and equipment on a local and regional transportation network, consisting of streets, railroads, transit facilities, bicycle lanes, and other modes of transportation, including walking.

3.12.1 Affected Environment

A traffic impact analysis determines the volume-to-capacity ratio; essentially how close the actual traffic volume at an intersection is to its maximum capacity, allowing planners to identify potential bottlenecks and areas where traffic flow could be significantly impacted. The Critical Lane Volume (CLV) Capacity Analysis Procedure as described in Section 5 of the Highway Capacity Manual, 7th Edition, A Guide for Multi Mobility Analysis (Transportation Research Board, 2022) allows a Level of Service (LOS) to be determined for each intersection. LOS is a quantitative measure used to rank traffic operational conditions along six levels of service designated A through F (Table 13). "A" represents good operating conditions and "F" represents unsatisfactory operating conditions (Transportation Research Board 2022).

VA strives for a Proposed Action CLV increase of no more than 20% above the No Action alternative over the same period; or, if greater than 20%, then not significantly more than the CLV increase under the No Action alternative over the same period. If the CLV increase with the Proposed Action by year 2044 is significantly greater than the No Action alternative, then VA strives for no to little decrease in the corresponding LOS.

Table 13. Level of Service Definitions

LOS Rating	Description of Traffic Conditions	CLV
A	Traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.	Less than 1,000
B	Reasonably free-flowing conditions, with slight restrictions to vehicle maneuvers within the traffic stream.	1,000-1,150
C	Traffic speed approaches free-flowing conditions, but freedom to maneuver within the traffic stream is noticeably restricted.	1,150-1,300
D	Traffic speed begins to reduce, and freedom to maneuver is seriously limited due to a high concentration of traffic.	1,300-1,450
E	Unpredictable traffic flow, with virtually no usable gaps in the traffic stream to accommodate vehicle maneuvers.	1,450-1,600
F	Unstable traffic flow resulting in delays and the formation of queues in locations where traffic demand exceeds roadway capacity.	Greater than 1,600

3.12.1.1 Proposed Action – Alternative 1

The Alternative 1 site is currently a wooded, undeveloped lot and does not generate any traffic or provide vehicle parking. The site is accessible from Robert Smalls Parkway.

The Alternative 1 conceptual plan shows the OPC development would be located in the western portion of the site, provide up to 500 parking spaces, and create a main entrance on Robert Smalls Parkway

opposite Ashton Overlook Drive. A secondary entrance on Robert Smalls Parkway would be located approximately 200 feet northeast of the main entrance.

On behalf of VA, a traffic impact analysis was performed to assess the existing transportation conditions surrounding the site and to estimate potential future traffic impacts on the Level of Service (LOS) on transportation conditions with and without the Proposed Action by the year 2044.

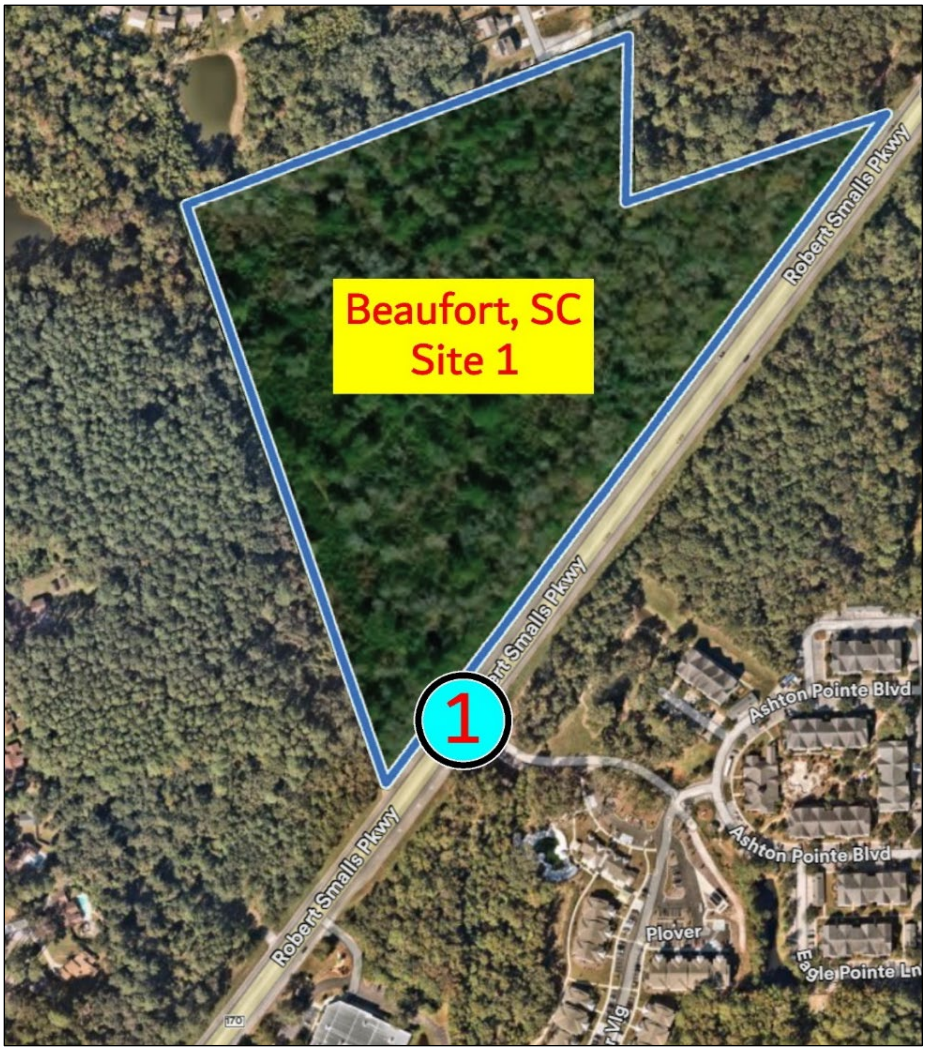
On November 14, 2024, intersection turning movement counts and capacity analyses were conducted at "Intersection 1," which is the intersection of Robert Smalls Parkway and Ashton Overlook Drive, where the proposed main entrance would be located (Figure 21). Peak hour traffic volumes were collected at the intersection from 6-9 a.m. and 3-7 p.m.

As shown in Table 14, Intersection 1 currently operates at LOS "A" conditions, meaning traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.

Table 14. Alternative 1 – Year 2024 LOS at the Traffic Impact Analysis Intersection

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	Robert Smalls Parkway & Ashton Overlook Drive	A	A

Figure 21. Alternative 1 – Traffic Impact Analysis Intersection Map



3.12.1.2 Proposed Action – Alternative 2

The Alternative 2 site is currently a wooded, undeveloped lot and does not generate any traffic or provide vehicle parking. The site is accessible from Robert Smalls Parkway.

The Alternative 2 conceptual plan shows the OPC development would be located in the western and central portions of the site, provide approximately 500 parking spaces, and create a main entrance on Robert Smalls Parkway, directly opposite Goethe Hill Road. A secondary entrance on Robert Smalls Parkway would be located approximately 400 feet southwest of the main entrance.

On behalf of VA, a traffic impact analysis was performed to assess the existing transportation conditions surrounding the site and to estimate potential future traffic impacts on the Level of Service (LOS) on transportation conditions with and without the Proposed Action by the year 2044.

On November 14, 2024, intersection turning movement counts and capacity analyses were conducted at two intersections selected based on their proximity to the site (Figure 22). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m. at each intersection.

As shown in Table 15, both intersections 1 and 2 operate at LOS "A" conditions, meaning traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.

Table 15. Alternative 2 – Year 2024 LOS at the Traffic Impact Analysis Intersections

Intersection	Crossroads	2024 LOS (a.m.)	2024 LOS (p.m.)
1	Robert Smalls Parkway & Goethe Hill Rd (west of site)	A	A
2	Robert Smalls Parkway & Goethe Hill Rd (proposed main entrance)	A	A

3.12.1.3 Proposed Action – Alternative 3

The Alternative 3 site is currently developed with a commercial warehouse and a former residential apartment complex. Traffic is generated by vehicles traveling to and from the commercial warehouse, which is accessible from Rahn Lane. The former apartment complex does not generate vehicle traffic but is accessible from Ribaut Road, Rahn Lane, Smilax Avenue, and Vaigneur Road.

The Alternative 3 conceptual plan shows the OPC development would encompass the entire site, including Rahn Lane and resulting in its removal as a roadway connecting Ribaut Road and Smilax Avenue. The OPC development would provide approximately 500 parking spaces and create a main entrance on Ribaut Road. Secondary entrances would be located on Ribaut Road, approximately 250 feet west of the main entrance, and Vaigneur Road and Smilax Avenue.

On behalf of VA, a traffic impact analysis was performed to assess the existing transportation conditions surrounding the site and to estimate potential future traffic impacts on the Level of Service (LOS) on transportation conditions with and without the Proposed Action by the year 2044.

On November 14, 2024, intersection turning movement counts and capacity analyses were conducted at two intersections selected based on their proximity to the site (Figure 23). Peak hour traffic volumes were collected from 6-9 a.m. and 3-7 p.m. at each intersection.

As shown in Table 16, both intersections 1 and 2 operate at LOS "A" conditions, meaning traffic flows freely, with little or no restrictions to vehicle maneuvers within the traffic stream.

Figure 22. Alternative 2 – Traffic Impact Analysis Intersection Map

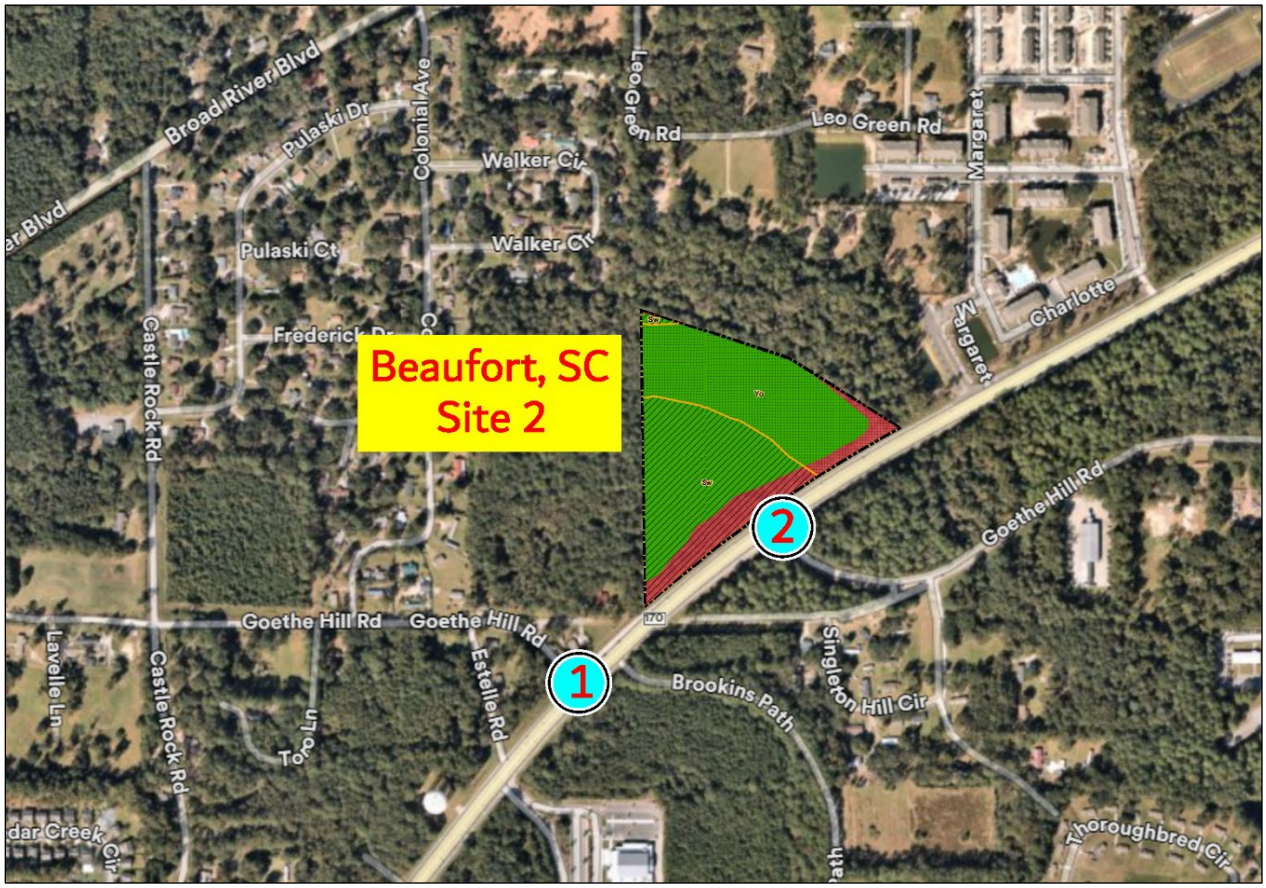


Table 16. Alternative 3 – Year 2024 LOS at the Traffic Impact Analysis Intersections

Intersection	Crossroads	2024 LOS (AM)	2024 LOS (PM)
1	Ribaut Road (US 21) & Rahn Lane	A	A
2	US 21 & Vaigneur Road/ Edinburgh Avenue	A	A

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action – Alternatives 1, 2, and 3

3.12.2.1.1 Construction

Under Alternatives 1, 2 or 3, construction activities would generate vehicle traffic involved with transporting construction and demolition debris off site; the delivery of construction materials and equipment to the site; workers commuting to and from the site; and the removal of equipment once construction is completed. To minimize impact on traffic flow on area roadways, deliveries of construction materials and equipment to and from the site would be periodic and generally scheduled to occur outside of peak commuting periods. Construction worker travel would occur daily and may overlap with peak commuting times. Although worker trips would take place during these peak periods, some of these trips might involve carpooling and/or public transit, reducing the effect on traffic.

Figure 23. Alternative 3 – Traffic Impact Analysis Intersection Map

Prior to constructing entrances along public roads, the private entity would be required to apply for and obtain a South Carolina Department of Transportation (SCDOT) Encroachment Permit to perform work within SCDOT maintained rights-of-way (SCDOT 2025). Additionally, Encroachment Permits would also be obtained from the Town of Port Royal (for Alternatives 1 and 3) (Town of Port Royal 2022) and the City of Beaufort (for Alternative 2) (City of Beaufort 2025b) for work on roadways in those municipalities. Temporary roadway lane closures may be required to ensure worker safety during construction and paving of new entrances in the right-of-way.

Therefore, construction of the Proposed Action at any one of the Alternative 1, 2, or 3 sites would have a temporary, negligible impact on traffic conditions on the surrounding roadways.

3.12.2.2 Proposed Action – Alternative 1

3.12.2.2.1 Operation

The traffic impact analysis projected the impact of the Proposed Action under Alternative 1 at the study intersection by the year 2044 (TTG 2024a). This analysis assumed a 3% annual baseline increase in traffic volume and then incorporated the additional traffic expected from the operation of the Proposed Action. The data was utilized to evaluate the future impact of the Proposed Action on the CLV and LOS at the study intersection by the year 2044, in comparison with the No Action alternative at the same intersection.

As shown in Table 17, the Alternative 1 study intersection is projected to continue to operate at satisfactory LOS levels with or without the OPC. While the Proposed Action would change the LOS from an "A" to a "B" in the p.m. peak, traffic conditions would remain satisfactory.

Therefore, the operation of the Proposed Action at the Alternative 1 site would have a permanent, negligible impact on traffic conditions.

Table 17. Alternative 1 – 2044 Traffic Impact Analysis Summary for the Study Intersection

ID	Intersection	No Action Alternative (by year 2044)				Proposed Action Alternative 1 (by year 2044)					
		2044 – a.m.		2044 – p.m.		2044 – a.m.			2044 – p.m.		
		LOS	CLV	LOS	CLV	LOS	CLV	% CLV change	LOS	CLV	% CLV change
1	Robert Smalls Parkway & Ashton Overlook	A	948	A	987	A	992	5%	B	1,146	16%

3.12.2.3 Proposed Action – Alternative 2

3.12.2.3.1 Operation

The traffic impact analysis projected the impact of the Proposed Action under Alternative 2 at the two study intersections by the year 2044 (TTG 2024b). This analysis assumed a 3% annual baseline increase in traffic volume and then incorporated the additional traffic expected from the operation of the Proposed Action. The data was utilized to evaluate the future impact of the Proposed Action on the CLV and LOS at the study intersection by the year 2044, in comparison with the No Action alternative at the same intersection.

As shown in Table 18, the Proposed Action under Alternative 2 would decrease the a.m. peak hour LOS from "C" to "D" at intersection 1, and from "A" to "B" during the p.m. peak hour at intersection 2. These LOS values represent satisfactory conditions and the CLV change would be less than 20%.

Therefore, the operation of the Proposed Action under Alternative 2 would have a permanent, negligible impact on traffic conditions.

Table 18. Alternative 2 – 2044 Traffic Impact Analysis Summary for the Study Intersections

ID	Crossroads	No Action Alternative (by year 2044)				Proposed Action Alternative 2 (by year 2044)					
		2044 – a.m.		2044 – p.m.		2044 – a.m.			2044 – p.m.		
		LOS	CLV	LOS	CLV	LOS	CLV	% CLV change	LOS	CLV	% CLV change
1	Robert Smalls Parkway & Goethe Hill Rd (western end)	C	1,282	B	1,099	D	1,302	2%	B	1,117	2%
2	Robert Smalls Parkway & Goethe Hill Rd	B	1,090	A	975	B	1,132	4%	B	1,130	16%

3.12.2.4 Proposed Action – Alternative 3

3.12.2.4.1 Operation

The traffic impact analysis projected the impact of the Proposed Action under Alternative 3 at the two study intersections by the year 2044 (TTG 2024c). This analysis assumed a 2.5% annual baseline increase in traffic volume and then incorporated the additional traffic expected from the operation of the Proposed Action. The data was utilized to evaluate the future impact of the Proposed Action on the CLV and LOS at the study intersections by the year 2044, in comparison with the No Action alternative at the same intersections. As shown in Table 19, the Proposed Action under Alternative 3 would decrease the a.m. peak hour LOS from "C" to "D" at both intersections 1 and 2. These LOS values represent satisfactory conditions and the CLV change would be less than 20%.

Therefore, the operation of the Proposed Action at the Alternative 3 site would have a permanent, negligible impact on traffic conditions.

Table 19. Alternative 3 – 2044 Traffic Impact Analysis Summary for the Study Intersections

1	Ribaut Road & Rahn Lane	C	1,252	D	1,344	D	1,336	7%	D	1,411	5%
2	Ribaut Road & Vaigneur Road/ Edinburgh Avenue	C	1,270	D	1,371	D	1,311	3%	D	1,404	2%

3.12.2.5 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. Current roadway conditions would remain unchanged. Although future traffic volumes are projected for the No Action alternative, they could be influenced by other possible developments in Beaufort or Port Royal.

Therefore, the No Action alternative would have no impact on traffic conditions.

3.13 Utilities

Utilities are the services that support the efficient and comfortable operation of a facility or location. Utilities include potable water, sanitary sewerage, electricity, telecommunications, and stormwater management.

3.13.1 Affected Environment

3.13.1.1 Proposed Action – Alternatives 1, 2, and 3

The Alternative 1, 2, and 3 sites are located in developed communities with well-established utility infrastructure. In the City of Beaufort and the Town of Port Royal, water and sewer services are provided by Beaufort-Jasper Water and Sewer Authority; electricity and natural gas are provided by Dominion Energy; and telecommunications services are provided by Hargray, Brightspeed, and Sparklight (City of Beaufort 2025c) (Town of Port Royal 2025b).

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action – Alternatives 1, 2, and 3

3.13.2.1.1 Construction

Under both Alternative 1 and 2, construction of the Proposed Action would require extending to the site utility lines for potable water, sewerage, electricity, and telecommunications. Under Alternative 3, current utility lines extending to the site may need to be rerouted. Under Alternatives 1, 2, or 3, stormwater would be managed in newly constructed on-site stormwater detention basins and would not be discharged to the municipal stormwater system. The Proposed Action would not include onsite treatment of sanitary sewage.

Under Alternatives 1, 2, or 3, as part of the final design, the private entity would be required to confirm and verify with utility providers that capacities are available to meet the projected demands for the OPC. The private entity would also be required to apply for and obtain permits required to connect to and utilize utility services.

Construction of utility infrastructure would involve upfront site work to create utility corridors and coordination with the utility providers to ensure uninterrupted utility services continue to current customers in the community. The private entity would be required to apply for and obtain any permits needed to use or cross rights-of-way to install utilities.

Therefore, the construction of the Proposed Action under Alternatives 1, 2, or 3 would have a temporary, negligible adverse impact on utilities due to temporary construction activities in rights-of-way.

3.13.2.1.2 Operation

Under Alternatives 1, 2, or 3, the private entity would be required to design the OPC to achieve Green Globes certification, which seeks to ensure the building efficiently uses electricity, water, and sewerage utilities, thereby lessening the demand for utilities. The private entity would be required to maintain any privately-owned on-site utility infrastructure to ensure that the quality of utility services continuously meets VA's operational requirements for the duration of VA's lease.

Therefore, the operation of the Proposed Action would have a permanent, negligible adverse impact through the increased consumption of utilities.

3.13.2.2 No Action Alternative

Under the No Action alternative, no changes to utility consumption would occur. Therefore, the No Action alternative would have no impact on any utility supplies or delivery infrastructure.

3.14 Community Services

Community services include police, fire, ambulance, medical and emergency services provided by VA or surrounding communities.

3.14.1 Affected Environment

3.14.1.1 Proposed Action - Alternatives 1, 2, and 3

The US Census shows that Beaufort County has a population of approximately 198,979 and a Veteran population of approximately 17,096 Veterans, or 11.1% of the total county population, which is 1.3 times higher than the statewide rate of 8.4% (Census Reporter 2025). The VA Charleston Health Care System offers a wide range of services for Veterans at eight locations throughout a 22-county area in South Carolina and Georgia. The outpatient clinics are currently over capacity, resulting in prolonged wait times for Veterans in need of care at a VA medical facility.

Public safety services are provided by the Beaufort Police Department and the Town of Port Royal Police Department. Fire and emergency/rescue services are provided by the Beaufort/Port Royal Fire Department. Additionally, the Beaufort County Sheriff's Office handles law enforcement and emergency management countywide.

Major hospitals in Beaufort include the Beaufort Memorial Hospital and the Naval Hospital Beaufort, which is a US Navy hospital that serves the nearby Marine Corps bases, Marine Corps Recruit Depot Parris Island and Marine Corps Recruit Depot Beaufort.

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action - Alternatives 1, 2, and 3

3.14.2.1.1 Construction and Operation

Under Alternative 1, 2 or 3, construction and operation of the Proposed Action would not induce or require changes in non-Veteran community services, such as force protection or medical services. Based on community impacts analyzed under prior VA OPC projects, the construction and operation of the Proposed Action would not increase needs for housing, social, or emergency services in the surrounding community. The increase in available jobs associated with the construction or operation of the Proposed Action would not result in an increase in the population of families with children exceeding the capacity of local schools.

The OPC would resolve service gaps and capacity issues of the VA Charleston Health Care System and provide a full range of outpatient medical services for Veterans in Beaufort. The OPC would serve Veterans with both primary care and mental health needs as well as offer pharmacy, laboratory, pathology, and social work services.

Therefore, by increasing area Veterans' access to quality health care, operation of the Proposed Action would result in a permanent, beneficial impact on community services related to health care for Veterans in Beaufort. There would be no impact on other local community services.

3.14.2.2 No Action Alternative

Under the No Action alternative, the VA Charleston Health Care System outpatient clinics would continue to be overburdened, and local Veterans would still experience service gaps. The No Action alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide Veterans in Beaufort.

Therefore, the No Action alternative would have a permanent, significant adverse impact on community services for Veterans in Beaufort.

3.15 Socioeconomics

Socioeconomics refers to the social and economic conditions in the communities surrounding the Proposed Action.

3.15.1 Affected Environment

3.15.1.1 Proposed Action - Alternatives 1, 2, and 3

Beaufort County, SC is located in the central portion of the South Carolina Lowcountry and includes the historic City of Beaufort, the resort community of Hilton Head Island, and three military bases (Beaufort County 2010). Marine Corps Air Station Beaufort, Marine Corps Recruit Depot Parris Island, and Naval Hospital Beaufort provide $2.4 billion annually to the local economy and employ approximately 20,000 people (Beaufort Regional Chamber of Commerce 2021). The gross domestic product (GDP) of Beaufort County in 2023 was $12,232,128 (in thousands of dollars) (FRED 2023). Major industries in the region include health care, military, education, tourism and hospitality, and manufacturing. The most common employment sectors in Beaufort include retail trade, health care and social assistance, and waste management services (DataUSA 2025).

The demographic data for Beaufort County, reported as percentage and compared to the entirety of South Carolina, is provided in Table 20 (Census Reporter 2023). Other key socioeconomic indicators representing the affected environment include the unemployment rate, low-income rate, and education attainment.

Table 20. Demographic Data for Beaufort County and the State of South Carolina

Area	Population	Population under 18 Years of Age	Population over 65 Years of Age	Minority (reporting other than white alone)	High School Graduates	Veterans
Beaufort County	198,979	17%	29%	20.4%	95.2%	11.1%
South Carolina	5,373,555	21%	19%	31%	90.2%	8.4%

3.15.1.2 Income, Poverty, and Employment

Beaufort County has a slightly lower median household income, slightly lower percentage of population below the poverty line, and slightly lower unemployment rate than the state of South Carolina (Census Reporter 2023).

Table 21. Regional and State Employment and Income

Area	Number of households	Median Household Income	Population Below Poverty Level	Unemployment Rate
Beaufort County	87,165	$56,353	9.5%	2.3%
South Carolina	2,177,733	$67,804	13.9%	4.2%

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action - Alternatives 1, 2, and 3

3.15.2.1.1 Construction

Under Alternatives 1, 2, or 3, construction of the Proposed Action would involve the temporary employment of construction workers and require materials that may be purchased from local and regional vendors. There would also be an increase in incidental spending by workers on food, lodging, products, and services, but the amount of spending would represent a negligible increase in the overall economic activity in Beaufort.

Therefore, construction of the Proposed Action under Alternative 1, 2, or 3 would have a temporary, negligible beneficial impact on socioeconomic conditions in Beaufort County.

3.15.2.1.2 Operation

The VA Charleston Health Care System would administer and staff the OPC, with approximately 100 new staff anticipated. The increase in staff at the OPC could result in an increase in incidental spending by workers on services provided within the local community, but the amount of spending would represent a negligible increase in overall economic activity in Beaufort County.

Therefore, operation of the Proposed Action under Alternative 1, 2, or 3 would result in a permanent, negligible beneficial impact on socioeconomic conditions in Beaufort County, but no impact at a regional or state level.

3.15.2.2 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. There would be no change to existing conditions at any site and socioeconomic conditions would remain unchanged.

Therefore, the No Action alternative would result in no impact on socioeconomic conditions in Beaufort County.

3.16 Potential for Generating Substantial Public Controversy

As discussed in Sections 3.6.1.1.2 and 5.0, VA has solicited input on the Proposed Action from the public, several federal, state, and local government agencies, and Tribes with interest in Beaufort County. The Proposed Action is anticipated to receive strong community support for improving Veterans' timely access to modern, state-of-the-art health care services in Beaufort County. See Appendix D for all regulatory agency correspondence and Appendix E for a record of all public engagement activities.

Therefore, the Proposed Action is not anticipated to generate substantial public controversy.

4.0 PROTECTION AND MITIGATION MEASURES

This chapter summarizes the measures identified throughout Chapter 3 that are incorporated into the Proposed Action, under all Alternatives 1, 2, and 3, to avoid or minimize potential adverse effects. The measures identified in Table 22 would be implemented and maintained by the private entity. Implementation of the measures identified in Section 3 would maintain potential impacts at less than significant adverse levels for all resources, but do not imply that impacts would be significant without these measures. For resources not listed, no measures were identified.

Table 22. Measures Incorporated in Proposed Action to Minimize or Avoid Potential Adverse Impacts

Resource	Minimization and Avoidance Measures
Aesthetics	The OPC facility and grounds would be professionally managed to maintain its appearance for the duration of VA's lease.
Air Quality	Design and operate the OPC to achieve Green Globes certification. To the extent practicable, for construction equipment greater than 150 horsepower, the private entity would aim to meet USEPA Tier 4 emissions standards, or Tier 3 standards if Tier 4 equipment is not available at the time of construction; tune and maintain all construction equipment in accordance with the equipment manufacturer's recommended maintenance schedule and specifications; use low-sulfur diesel or biodiesel in construction equipment. The private entity would be responsible for implementing any NPDES permit requirements such as dust control measures and off-site sediment tracking.

Resource	Minimization and Avoidance Measures
Wildlife and Habitat	1. **Time-of-Year Restrictions**: Tree clearing would be avoided during critical periods for wildlife. Specifically, clearing would be restricted during the tricolored bat and Rafinesque's big-eared bat pup season (May 1 to July 31) and the winter torpor season (December 15 to February 15). SCDNR recommends a survey for maternity roost trees be conducted prior to any clearing activity to avoid and minimize potential impacts, as well as a survey plan that is provided to SCDNR for review prior to the survey being conducted. For migratory birds protected under the Migratory Bird Treaty Act (MBTA), tree clearing would be avoided during the nesting season (February 1 to September 10). If clearing during the nesting season is unavoidable, pre-construction surveys would be conducted to identify and protect active nests. For the spotted turtle and broad-striped dwarf siren, construction would be avoided January 15 to July 15 in the areas within or adjacent to aquatic resources. If construction during this time is unavoidable, then the private entity would implement SCDNR-required survey, trap, and exclusion methods (full description of these methods is provided in Appendix D). 2. **Pre-Construction Surveys**: As described above, prior to vegetation clearing, surveys would be conducted for federally listed species such as the tricolored bat and pondberry, as well as state-listed species like Rafinesque's big-eared bat, spotted turtle, and broad-striped dwarf siren. These surveys would determine the presence or absence of these species and inform necessary protective measures. 3. **Habitat Preservation**: Efforts would be made to preserve existing habitats to the maximum extent possible. This includes retaining mature trees with suitable roost characteristics for bats and maintaining wetland areas that provide habitat for species like the spotted turtle and broad-striped dwarf siren. 4. **Coordination with Regulatory Agencies**: The private entity responsible for construction would coordinate with the U.S. Fish and Wildlife Service (USFWS) and the South Carolina Department of Natural Resources (SCDNR) to ensure compliance with federal and state regulations. This includes obtaining necessary permits and implementing any required compensatory mitigation measures. 5. **Tree Removal Permits** Town of Port Royal and City of Beaufort tree removal permits would be obtained prior to clearing. This process involves a certified arborist's tree survey and adherence to any conditions set by the local authorities, such as replacement planting or mitigation fees.

Resource	Minimization and Avoidance Measures
Floodplains, Wetlands, and Coastal Zone	**Floodplains**. Portions of the Alternative 1 and Alternative 2 sites are located within the 500-year floodplain. Should the private entity design and construct the OPC outside of the floodplain, then no impacts to floodplains would occur. Should the final design for the OPC at the Alternative 2 site, which is located in the City of Beaufort, be unable to avoid the 500-year floodplain, then the private entity would comply with the City of Beaufort floodplain ordinance by elevating the OPC above the base flood elevation or using floodproofing design elements. The Alternative 1 site, which is located in Port Royal, is not subject to the Port Royal floodplain ordinance which applies only to special flood hazard areas and critical developments. **Wetlands**. The private entity may design the OPC to avoid filling wetlands. However, if the design requires filling 0.5 acres or less of wetlands, the private entity must obtain a CWA Nationwide Permit 39 from USACE. If filling more than 0.5 acres of wetlands is required, a CWA Individual Permit from USACE would be necessary. Concurrently with this process, a CWA Section 401 Water Quality Certification review by the SCDES would occur as part of the joint federal/state review of Section 404 IP application. The private entity would be responsible for implementing any compensatory mitigation for unavoidable wetland impacts, as required by USACE and SCDES.
Geology and Soils	Prior to construction, private entity would apply for coverage under the SCDES National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities. Soil erosion and sedimentation minimized by implementing permit-required best management practices (BMPs), including those specified in SCDES *Water Regulations and Standards: Erosion and Sediment Reduction and Stormwater Management*.
Hydrology and Water Quality	Construction stormwater managed through SCDES NPDES General Permit for Stormwater Discharges from Construction Activities and implement and maintain permit-required BMPs, such as bio-retention areas, vegetated swales, and retention basins. The private entity would also implement a Spill Prevention, Control, and Countermeasure plan.
Land Use	Private entity to comply with the Town of Port Royal (Alternatives 1 and 3) and City of Beaufort (Alternative 2) zoning regulations.

Resource	Minimization and Avoidance Measures
Noise	If necessary during construction, the private entity would use shields or other physical barriers to restrict noise transmission; provide soundproof housings or enclosures for noise producing machinery; use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified; conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum; select material transportation routes as far away from sensitive receptors as possible; shut down noise-generating heavy equipment when not in use. Construction would follow the Town of Port Royal (for Alternatives 1 and 3) noise ordinance, which prohibits loud noises from 10 p.m. and 7 a.m.; or City of Beaufort (for Alternative 2) noise ordinance, which prohibits loud noises from 9 p.m. and 8 a.m. Private entity to implement a hearing conservation program when construction worker noise exposure is at or above 85 decibels averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average, including providing hearing protection.
Vibration	Private entity to assess potential construction-period vibration impacts as part of the final design phase, when construction methods and the locations of specific types of construction equipment have been identified. Measures for reducing vibration impacts to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.
Solid Waste and Hazardous Materials	Private entity to recycle or reuse construction debris to the maximum extent practicable. Only materials that cannot be reused or recycled would be transported off-site for disposal at a landfill approved for construction debris. All soil that cannot be reused on site would be transported to an appropriate landfill for reuse as fill or daily cover. Solid wastes generated at the OPC would be disposed of in designated bins and dumpsters and transported and disposed of at a USEPA-licensed disposal facility. Asbestos-containing materials and lead-based paints are likely present on the buildings at the Alternative 3 site. Prior to demolition of the buildings, the private entity would be responsible for assessing the buildings for ACM and LBP and proper management and disposal of ACM and LBP wastes.
Traffic, Transportation, and Parking	Prior to constructing entrances along public roads, the private entity would be required to apply for and obtain a SCDOT Encroachment Permit to perform work within SCDOT-maintained rights-of-way. Additionally, Encroachment Permits would be obtained from the Town of Port Royal (for Alternatives 1 and 3) and the City of Beaufort (for Alternative 2) for work on roadways in those municipalities. Temporary roadway lane closures may be required to ensure worker safety during construction and paving of new entrances in the right-of-way.

Resource	Minimization and Avoidance Measures
Utilities	Private entity to apply for and obtain an SCDOT, Town or Port Royal, or City of Beaufort Encroachment permit for work or activity on or crossing any right-of-way to extend utilities. Private entity to design and operate the OPC to achieve Green Globes certification to ensure efficient use of electricity, water, and sewerage during operation. The private entity would be required to maintain any privately-owned on-site utility infrastructure required for operation of the Proposed Action for the duration of VA's lease.

5.0 PUBLIC PARTICIPATION, COORDINATION, AND CONSULTATION

5.1 Public Involvement

5.1.1 Scoping

VA initiated the public scoping process for the Proposed Action with publication of a notice in *The Island Packet* and *The Beaufort Gazette* announcing the opportunity to provide early input on the Proposed Action. The notice was published on December 20 and 22, 2024. The scoping notice was also published on the VA website at: https://www.cfm.va.gov/environmental/. VA also electronically sent the scoping notice to selected federal, state, and local agencies; Native American Tribes; and elected officials to solicit input regarding the scope of the EA and environmental issues for in-depth analysis. Appendix E contains all public engagement materials.

VA is publishing this Draft EA for a 30-day public review and comment period. A notice of availability (NOA) of the Draft EA is being posted in *The Island Packet* and *The Beaufort Gazette.* The NOA explained how to obtain the Draft EA electronically from the VA website at https://www.cfm.va.gov/environmental/ and in print at the Beaufort Branch Library, located at 311 Scott Street, Beaufort, SC, 29902. VA also electronically sent the NOA to federal, state, and local agencies, Tribes, and community stakeholders, to solicit comments on the Draft EA. The NOA explained that comments on the Draft EA are to be sent to vacoenvironment@va.gov. VA will summarize and address substantive comments in the Final EA.

5.2 Consultation and Stakeholder Coordination

5.2.1 Consultation

On May 5 and 6, 2025, VA initiated Section 106 consultation with the SC SHPO; Beaufort County Historic Preservation Review Board (the Certified Local Government); Beaufort County Historical Society; and the five federally recognized Tribes with interests in Beaufort County, SC: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and the Tuscarora Nation. On June 10, 2025, the SC SHPO informed VA they were continuing to review the Section 106 consultation request. VA will incorporate responses from all Section 106 consulting parties in the Final EA. See Section 3.6.1.1.2 for more information and Appendix C for copies of all Section 106 correspondence.

VA requested written concurrence from USFWS and SCDNR on May 9, 2025, to confirm the effect determinations and the following avoidance measures. A response was received from SCDNR on June 9, 2025, and from USFWS on June 10, 2025. SCDNR provided additional guidance on avoidance measures for the spotted turtle and broad-striped dwarf siren; these measures are incorporated in this EA. USFWS requested further information regarding the potential presence of pondberry habitat. VA is currently preparing a response to USFWS and will update the Final EA to reflect the outcome of the consultation. Copies of correspondence with SCDNR and USFWS are provided in Appendix D.

5.2.2 Stakeholder Coordination

VA electronically sent stakeholder scoping notification letters to the entities listed below. VA has addressed all substantive responses and information in this EA. Appendix E contains copies of the scoping correspondence including comments and VA's responses.

5.2.2.1 Federal Agencies

- U.S. Environmental Protection Agency, Region 4

5.2.2.2 State Agencies

- South Carolina State Clearinghouse
- South Carolina Department of Natural Resources
- South Carolina Department of Environmental Services
- South Carolina Department of Transportation
- South Carolina Department of Archives and History
- South Carolina Department of Veterans' Affairs

5.2.2.3 City Agencies

- Mayor Phil Cromer, City of Beaufort
- Mayor Kevin Phillips, Town of Port Royal

5.2.2.4 Federally Recognized Tribes with Ancestral Ties to Beaufort County, SC.

- Alabama-Quassarte Tribal Town
- Muscogee (Creek) Nation
- Catawba Indian Nation
- Eastern Shawnee Tribe of Oklahoma
- Tuscarora Nation

5.2.2.5 Environmental Organizations with Interests in Beaufort County, SC

- Beaufort Conservation District

5.2.2.6 Veteran Organizations with Interests in South Carolina

- VFW 8760 Jess C. Gregg Post
- South Carolina Veterans' Trust Fund
- SCDVA County Veterans' Affairs Office - Beaufort County

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7.0 REFERENCES CITED

Beaufort County. 2024. "Beaufort County Comprehensive Plan." *Beaufort County.* https://www.beaufortcountysc.gov/council/comprehensive-plan/2040_CompPlan_Adopted.pdf.

Beaufort County. 2010. *Beaufort County Comprehensive Plan.* Economic Development, Beaufort: Beaufort County, SC. https://www.beaufortcountysc.gov/council/comprehensive-plan/documents/2010-comprehensive-plan-documents/chapter-7-economic-development.pdf.

Beaufort Regional Chamber of Commerce. 2021. *Military Installations.* https://beaufortchamber.org/military/military-installations/.

Census Reporter. 2023. "Beaufort County, PA - ACS 2023 1-year." *Census Reporter.* Accessed January 24, 2025. https://censusreporter.org/profiles/05000US45013-beaufort-county-sc/.

—. 2025. *Beaufort County, South Carolina. ACS 2023 1-Year Data.* https://censusreporter.org/profiles/05000US45013-beaufort-county-sc/.

—. 2023. *Census Reporter Beaufort County, SC.* https://censusreporter.org/profiles/05000US45013-beaufort-county-sc/.

City of Beaufort. 2023. "Beaufort, South Carolina - The Beaufort Development Code. Chapter 5.4: - Tree Removal." December 7. https://library.municode.com/SC/Beaufort/CODES/The_Beaufort_Development_Code?nodeId=n5LAPALI_5.4TRRE.

—. 2025. "Chpater 4. - Flood Damage Prevention Ordinance." *Beaufort, South Carolina, Code of Ordinances.* May 09. https://library.municode.com/sc/beaufort/codes/code_of_ordinances?nodeId=CO_PT5PLDE_CH4FLDAPROR.

—. 2015. "Code of Ordinances, Section 9-1008. Loud and Unseemly Noises." *City of Beaufort, South Carolina.* May 13. https://www.cityofbeaufort.org/DocumentCenter/View/117/Noise-Ordinance-2016.

—. 2025b. "Encroachment Permit." *City of Beaufort, South Carolina.* https://www.cityofbeaufort.org/469/Enroachment-Permit.

—. 2025c. *Utilities - Most Common Utilities for Beaufort Residents and Businesses.* January. https://www.cityofbeaufort.org/647/Utilities.

DataUSA. 2025. *Beaufort SC Census Place.* https://datausa.io/profile/geo/beaufort-sc/.

Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual, Table 7-1, Construction Equipment Noise Emission Level. FTA Report No. 0123. September.* Washington, D.C.: US Department of Transportation, Federal Transit Adminstration.

FEMA. 2024. "FEMA Flood Map Service Center." *Federal Emergency Management Agency.* June. Accessed January 2025. https://hazards-

fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

Fenneman, Nevin M. 1938. *Physiography of Eastern United States.* New York, New York. : McGraw-Hill Book Publishing.

FRED. 2023. "Total Gross Domestic Product for Beaufort County, PA." *Federal Reserve Economic Data.* Accessed January 24, 2025. https://fred.stlouisfed.org/series/GDPALL45013.

FTA. 2018. *Transit Noise and Vibration Impact Assessment Manual, Table 7-1, Construction Equipment Noise Emission Level. FTA Report No. 0123. September.* Washington, D.C.: US Department of Transportation, Federal Transit Adminstration.

GBI. 2025. "Green Globes Certification." *Green Building Initiative.* https://thegbi.org/greenglobes/.

Griffith, Glenn E., James M. Omernik, Jeffrey A. Comstock, Steve Lawrence, and Trish Foster. 2001. *Ecoregions of Georgia. map scale 1:1,500,000. U.S. Environmental Protection Agency, Corvallis, Oregon. .*

National Park Service [NPS]. 2024. "Coastal Plain Province. Electronic document." Accessed December 6, 2024. https://www.nps.gov/articles/coastalplain.htm.

OSHA. 2022. "OSHA Technical Manual (OTM) Section III: Chapter 5." *Occupational Safety and Health Administration.* July 6. https://www.osha.gov/otm/section-3-health-hazards/chapter-5.

Port Royal. 2024. "Port Royal Zoning Map." *Town of Port Royal.* https://image.beaufortcountysc.gov/documents/zoningmaps/toprzoning.pdf.

SCDES. 1993. "Erosion and Sediment Reduction and Stormwater Management Regulations." *SC Department of Environmental Services.* https://des.sc.gov/programs/bureau-water/water-regulations-standards/water-regulations-standards-erosion-and-sediment-reduction-and-stormwater-management.

—. 2024. "NPDES General Permit." *SC Department of Environmental Services.* https://des.sc.gov/programs/bureau-water/national-pollutant-discharge-elimination-system-npdes/npdes-general-permits.

SCDES. 2024b. *Watershed profiles of Broad River, Beaufort River, Port Royal Sound – The Broad River/ Beaufort River/ Port Royal Sound Basin (hydrologic unit 03050208).* Columbia: South Carolina Department of Environmental Services. https://portroyalsoundfoundation.org/wp-content/uploads/2024/02/DHEC-WatershedProfile.pdf.

SCDNR. 2013. *An Overview of the Eight Major River Basins of South Carolina.* Columbia: South Carolina Department of Natural Resources. https://www.dnr.sc.gov/water/waterplan/pdf/Major_Basins_of_South_Carolina.pdf.

SCDOT. 2022. *Chapter 11 - South Carolina Geology and Seismicity. Geotechnical Design Manual.* Columbia: South Carolina Department of Transportation.

https://www.scdot.org/content/dam/scdot-legacy/business/pdf/geotech/2022-by-chapter/Chapter11-%20SCGeologyandSeismicity-02082022.pdf.

—. 2025. "Encroachment Permits." *South Carolina Department of Transportation.* https://www.scdot.org/business/permits.html.

SCWRC. 1989. *Hydrogeology and Saltwater Contamination of the Floridan Aquifer in Beaufort and Jasper Counties, South Carolina. Water Resources Commission Report Number 158.* Columbia: South Carolina Water Resources Commission. https://des.sc.gov/sites/des/files/DNR/Hydrology/pdfs/reports/SCWRC_158.pdf.

Thornbury, William. 1965. *Regional Geomorphology of the United States.* New York: John Wiley.

Town of Port Royal. 2022. "Encroachment Permits, Ordinance No. 2022-13." *Town of Port Royal.* November 9. https://www.portroyal.org/DocumentCenter/View/847/Encroachment-Permits?bidId=.

Town of Port Royal. 2021. *Port Royal 2030 Comprehensive Plan - 10.18.2021.* Town of Port Royal. https://www.portroyal.org/DocumentCenter/View/942/Port-Royal-2030?bidId=.

—. 2010. "Port Royal Flood Damage Prevention Ordinance - Code of Ordinances & Recent Amendements." *Town of Port Royal - Code of Ordinances & Recent Amendements.* November 10. https://www.portroyal.org/DocumentCenter/View/160/Port-Royal-Flood-Damage-Prevention-Ordinance-PDF.

—. 2025. "Port Royal, South Carolina - Code of Ordinances / Chapter 20 - TREES." March 13. https://library.municode.com/sc/port_royal/codes/code_of_ordinances?nodeId=COOR_CH20TR.

—. 2011. "Section 15-18. - Noise Control." *Town of Port Royal Code of Ordinances.* September 14. https://library.municode.com/sc/port_royal/codes/code_of_ordinances?nodeId=COOR_CH15OFMIPR_S15-18NOCO.

—. 2025b. *Utilities - Information for New Residents.* January. https://www.portroyal.org/255/Information-for-New-Residents.

Transportation Research Board. 2022. "Highway Capacity Manual, 7th Edition."

TTG. 2024a. *Traffic Impact Analysis for 708 Robert Smalls Parkway.* Baltimore: The Traffic Group, Inc.

TTG. 2024c. *Traffic Impact Analysis for Ribaut Road.* Baltimore: The Traffic Group, Inc.

TTG. 2024b. *Traffic Impact Analysis for Robert Smalls Parkway and Goethe Hill Road.* Baltimore: The Traffic Group, Inc.

USEPA. 2025. "South Carolina Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants." *USEPA Green Book.* https://www3.epa.gov/airquality/greenbook/anayo_sc.html.

USFWS. 2024. "Endangered Species Act Section 7 Consultation." *U.S. Fish and Wildlife Service.* https://www.fws.gov/service/esa-section-7-consultation.

USGS. 1936. *Geology of the Coastal Plain in South Carolina.* Washington, D.C.: U.S. Department of the Interior, U.S. Geological Survey. https://pubs.usgs.gov/bul/0867/report.pdf.

—. 2025b. "Groundwater Levels for the Nation. USGS 322427080461609 BFT-1736." *United States Geological Survey.* https://nwis.waterdata.usgs.gov/usa/nwis/gwlevels/?agency_code=USGS&site_no=322427080461609.

—. 2025c. "Groundwater Levels for the Nation. Well ID USGS 322518080445909 BFT- 118." *https://nwis.waterdata.usgs.gov/nwis/gwlevels?site_no=322518080445909&agency_cd=USGS&format=html.* https://nwis.waterdata.usgs.gov/usa/nwis/gwlevels/?site_no=322518080445909.

—. 2025b. *USGS Watershed Boundaries.* https://www.arcgis.com/home/webmap/viewer.html?webmap=2c786babdaa34c93b7f9d37e82ba4748.